

# EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
ADV. PRO. NO. 23-1335 JKS

- - -

In Re:

National Realty Investment  
Advisors, LLC, et al.,  
Debtors.

AIRN Liquidation Trust Co., LLC,  
in capacity as Liquidation Trustee  
of the AIRN Liquidation Trust,  
Plaintiff,

v

Media Effective, LLC, et al.,  
Defendants.

- - -

Videotaped deposition of GLENN A. La MATTINA,  
taken at the law offices of Obermayer, Rebmann,  
Maxwell & Hippel, 1120 Route 73, Suite 420, Mount  
Laurel, New Jersey, on Friday, March 22, 2024,  
commencing at 10:00 a.m., before Alan L. Lesky,  
Certified Court Reporter of the State of  
New Jersey, pursuant to notice.

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19

20 Also Present:

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24

25

1 W I T N E S S I N D E X

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1 THE VIDEOGRAPHER: We are now on the  
2 record. This begins video number one in the  
3 deposition of Glenn A. La Mattina in the matter  
4 of AIRN Liquidation Trust Co. LLC et al., v Media  
5 Effective LLC et al., in the United States  
6 Bankruptcy Court, District of New Jersey.

7 Today is Friday, March 22nd, 2024 and the  
8 time is 9:43 a.m. This deposition is being taken  
9 at Obermayer, Rebmann, Maxwell and Hippel LLP,  
10 Mount Laurel, New Jersey at the request of  
11 Obermayer, Rebmann, Maxwell and Hippel, LLP.

12 The videographer is Zachary Cloyd of Magna  
13 Legal Services. The court reporter is Alan Lesky  
14 of Magna Legal Services. Will counsel and all  
15 parties present state their appearances and who  
16 they represent.

17 MR. GEORGE: Edmond George on behalf of  
18 Javier Torres, the Torres family and Media  
19 Effective.

20 MS. LASLEY: Aneca Lasley on behalf of  
21 the Liquidation Trustee. Also in attendance  
22 today by conference only are Louis Delucia,  
23 D-u-l-u-c-i-a, Alyson, A-l-y-s-o-n, Fiedler,  
24 F-i-e-d-l-e-r, and Erica, E-r-i-c-a, Arras,  
25 A-r-r-a-s.

1 THE VIDEOGRAPHER: Will the court  
2 reporter please swear in the witness.

3 Glenn La Mattina, having been duly sworn, was  
4 examined and testified as follows:

5 EXAMINATION BY MR. GEORGE:

6 Q. Mr. La Mattina, my name is Ed George and  
7 I represent Javier Torres and his family and  
8 Media Effective. We'll be taking your deposition  
9 today in connection with an adversary that was  
10 filed against my clients by the Liquidating Trust  
11 of NAIR. Have you ever had your deposition taken  
12 before?

13 A. Many, many, many years ago.

14 Q. Let me just go through the rules.

15 A. Sure.

16 Q. I'm going to try to ask you questions  
17 about your relationship with NAIR and it's --

18 A. Excuse me, it's NIRA.

19 MS. LASLEY: And I'll correct both of  
20 you. It's NRIA.

21 Q. And I'm going to be asking you about  
22 your relationship to that company and the  
23 declaration you filed in the adversary proceeding  
24 on behalf of the Trustee. I'll try to ask the  
25 questions to you in a straightforward way.

1           If you don't understand the question you have  
2   to tell me because if you just answer the  
3   question I'm going to assume you heard it, you  
4   understood it and your answer is responsive.

5           A.   Um-hum.   Okay.

6           Q.   You can't do um-hum --

7           A.   Yes.

8           Q.   -- or huh-uh, you have to answer  
9   verbally with a yes or a no because um-hum or a  
10   huh-uh could be misconstrued by somebody and we  
11   want to make sure that the record is clear.

12          A.   Correct.   Okay.

13          Q.   I'll try not to talk when you're talking  
14   and you try not to talk when I'm talking and that  
15   way the record will be clear.   Because as you can  
16   see the reporter is here and they need to take  
17   down this information in a clear way and it will  
18   be harder to do if you and I are talking over  
19   each other.   Okay?

20          So when did you have your deposition last  
21   taken?

22          A.   Oh, God, I don't even know the date.  
23   Years ago.

24          Q.   Were you a defendant in a lawsuit?

25          A.   To be honest with you I don't even



1 remember. I know I had to go --

2 Q. Have you ever been a defendant in a  
3 lawsuit?

4 A. No.

5 Q. I'm going to give you two documents.  
6 We're going to mark them as La Mattina 1. Just  
7 take a minute and look at that document if you  
8 could.

9 (Off the record)

10 Q. So, Mr. La Mattina, did you receive this  
11 document?

12 A. Yes, I did.

13 Q. Can you go to the page that says  
14 documents to be produced prior to the deposition.

15 A. Um-hum.

16 Q. Before the deposition Ms. Lasley  
17 indicated you didn't have any documents in your  
18 possession. But I want to go through these and  
19 ask you about what efforts you made to find these  
20 documents if any?

21 A. Well, I can tell you right --

22 Q. Excuse me. I'll ask you the questions.

23 A. Okay.

24 Q. Do you have any written communications  
25 between you and the Trustee or its counsel?

1 A. No.

2 Q. Did you ever email with Ms. Lasley or  
3 with the Liquidating Trustee?

4 A. I think they asked me to send some kind  
5 of document over to sign the last time.

6 Q. Was there any communications in  
7 connection with that or was it just a document?

8 A. Well, no. They reached out to me. They  
9 said they wanted a statement. I wanted to --  
10 they wanted me to appear in front of them at the  
11 time and I said I was starting a new job. I have  
12 training I'm doing. I can't do it. They said  
13 okay, we'll send over a statement and look it and  
14 sign it.

15 Q. Who wrote the statement?

16 A. Who wrote it?

17 Q. Yes.

18 A. They did. They gave it to me to review.

19 Q. Did you make revisions to it?

20 A. Some minor stuff.

21 Q. Do you have any of the copies of any of  
22 the things you marked up?

23 A. No.

24 Q. What did you do with them?

25 A. I just got rid of it after I sent it

1 over to 'em. I didn't keep it. Yes, I just got  
2 rid of it. I threw it out. I didn't need it.

3 Q. So you emailed it back to them?

4 A. Yes.

5 Q. So you have email communicated with  
6 them?

7 A. I do have email, yeah.

8 Q. Any other ones other than that?

9 A. Not as far as I'm aware, no.

10 Q. Have you ever had any discussions with  
11 the Trustee about whether the Trustee might have  
12 any claims against you?

13 A. As far as I know they said no.

14 Q. That's not what I asked you. Sir,  
15 listen to the question and answer the question I  
16 ask, not the question you want me to ask. Okay?

17 A. Okay.

18 Q. Did you have any discussions with the  
19 Trustee about the possibility that there were  
20 claims against you?

21 A. Yes.

22 Q. When was that?

23 A. When I met with them at I guess one of  
24 their offices in North Jersey with Rick Barry.

25 Q. When was that?

1 A. I don't have the exact date.

2 Q. How about generally was it in 2022,  
3 2021, 2020?

4 A. Probably 2022.

5 Q. Do you remember the month?

6 A. No.

7 Q. You went in and you had a meeting with  
8 the Trustee and his counsel?

9 A. With Rick Barry, his associates and I  
10 believe there was an attorney on a video call or  
11 conference.

12 Q. When you say Rick Barry is that the  
13 gentleman that used to work for the New Jersey  
14 Securities Exchange Bureau?

15 A. I believe so, yes.

16 Q. How do you know him?

17 A. I was introduced to him via a phone call  
18 from him that he was representing or working with  
19 the investors.

20 Q. You got a call from Rick Barry that he  
21 was working as an investigator for the investors?

22 A. Correct.

23 Q. Did you know whether Mr. Barry had any  
24 relationship with the Trustee or his counsel?

25 A. No.

1 Q. Do you know whether Mr. Barry was hired  
2 by the Trustee or his counsel?

3 A. I have no idea.

4 Q. How do you communicate with Mr. Barry?

5 A. Telephone.

6 Q. Did you ever email him?

7 A. Probably.

8 Q. What's his email address?

9 A. I have no idea off the top of my head.

10 Q. What's your email address?

11 A. GLM274 at Gmail.

12 Q. Have you had that email for a period of  
13 time?

14 A. Yes.

15 Q. How long?

16 A. Years.

17 Q. While you were at NRIA?

18 A. Yes.

19 Q. Did you have any contract of employment  
20 between you and NRIA?

21 A. Yes.

22 Q. Did you have a copy of it?

23 A. On my computer, yes.

24 Q. Look at number 2. So you had that  
25 document and you failed to produce it, right?

1 A. Yes.

2 Q. And you had communications between you  
3 and the Trustee and you didn't produce any of  
4 those, right?

5 A. Correct.

6 Q. Do you have any communications regarding  
7 any promise, agreement, representation  
8 forbearance or accommodation that might be  
9 offered by the Trustee to you for your  
10 cooperation in this case?

11 A. No.

12 Q. Did the Trustee tell you that he thought  
13 he had claims against you?

14 A. When I asked them about that they said  
15 no. I should have -- no.

16 Q. I didn't ask you that. I asked you did  
17 the Trustee tell you that he had claims --

18 A. No.

19 MS. LASLEY: Hold on just a second.  
20 Wait until he finishes his question before you  
21 answer --

22 THE WITNESS: No problem.

23 MS. LASLEY: Hold on. You just did it  
24 to me too. This gentleman here is trying to take  
25 down everything.

1 THE WITNESS: I understand.

2 MS. LASLEY: And he can't do it when  
3 we're both talking or you are both talking.

4 BY MR. GEORGE:

5 Q. So I want you to recast if you will the  
6 conversation you had with the Trustee starting  
7 with what prompted you to go to either -- New  
8 York or North Jersey?

9 A. North Jersey.

10 Q. What prompted that?

11 A. They wanted to know about my  
12 relationship to NRIA and what I did for NRIA.

13 Q. Did you go there under a subpoena or did  
14 you go there voluntarily?

15 A. Originally I said I didn't feel like  
16 doing it.

17 Q. And you got a subpoena?

18 A. No. They called me back probably a  
19 couple months later and he said instead of going  
20 and getting a subpoena why don't you be nice and  
21 come in and talk to me.

22 Q. Why was it that you didn't feel like  
23 doing it?

24 A. Because I thought it was a waste of  
25 time.

1 Q. In what way?

2 A. In what way?

3 Q. Yeah. Why is it a waste time? The  
4 Trustee is trying to collect money from investors  
5 from a company that you were one of the chief  
6 operating officers of.

7 A. Right. I know in most cases -- and I  
8 don't take this negatively -- I think the  
9 attorneys are trying to get more money out of  
10 everything versus the investors. I think the  
11 investors only get pennies on the dollar and at  
12 the end the day I don't think they make the  
13 investors any happier than what they were.

14 Q. You think the Trustee's efforts are  
15 folly?

16 A. That's my own personal opinion.

17 Q. No, I'm asking you.

18 A. Personal opinion.

19 Q. So then did they contact you again after  
20 the first indication that you had that you didn't  
21 want to appear?

22 A. Yes. I said that.

23 Q. When was that in relationship to when  
24 you first got the phone call to come meet with  
25 them?



1 A. A couple months.

2 Q. Do you remember when that was, what  
3 month that was?

4 A. No.

5 Q. Was it in the spring or summer, was it  
6 in the winter?

7 A. I'd have to look at my calendar. I  
8 don't know.

9 Q. You don't remember whether it was  
10 snowing or warm?

11 A. It wasn't snowing.

12 Q. Was it cold?

13 A. I don't remember.

14 Q. How did you get to Newark or New York?

15 A. I drove.

16 Q. Did the Trustee provide you any  
17 documents other than the document that you  
18 mentioned you signed and sent back?

19 A. No. Do you have a water?

20 MR. GEORGE: Anybody else need a water?

21 THE VIDEOGRAPHER: We're going off  
22 record, the time is 9:56 a.m.

23 (Off the record)

24 THE VIDEOGRAPHER: Back on the record,  
25 the time is 9:57 a.m.

1 Q. Do you have an accountant?

2 A. Yes.

3 Q. What's his name?

4 A. I just switched. Hold on. Give me a  
5 minute. Okay. His name is Mark Weisholtz,  
6 W-e-i-s-h-o-l-t-z. He's in Springfield on Morris  
7 Avenue.

8 Q. Is he an individual or is he with a  
9 firm?

10 A. Individual.

11 Q. On Morris Avenue, is that what you said?

12 A. Yeah, Morris Avenue.

13 Q. Springfield?

14 A. Yes.

15 Q. So you mentioned you had a contract for  
16 employment with NRIA, right?

17 A. Correct.

18 Q. And was it for a term?

19 A. Ongoing. It was open.

20 Q. What was your compensation?

21 A. Well, originally when I first was hired  
22 it was verbal. I was hired at a hundred thousand  
23 and change, I believe 110 offhand back in 2018.  
24 Then I got a written contract probably 2021, '22.

25 Q. So prior to '21 or '22 your arrangement

1 for employment was an oral agreement?

2 A. Correct.

3 Q. And you made \$110,000 a year. Was that  
4 a salary?

5 A. 1099.

6 Q. Were there any bonus or incentive  
7 packages for you in 2018?

8 A. At different times Nick would say to me  
9 you're doing a good job, we'll give you a little  
10 bonus or good job here, whatever, here's an extra  
11 put in your billing.

12 Q. When you say whatever are we talking  
13 about 20,000?

14 A. No.

15 Q. 50,000?

16 A. No.

17 Q. 10,000?

18 A. Maybe a thousand. Whatever it might be.

19 Q. Did you have any reimbursement of  
20 expenses?

21 A. Yes.

22 Q. What kind of arrangement was that?

23 A. If I had dinner with somebody, get the  
24 receipt, sometimes hotels if I was traveling,  
25 stuff like that.

1 Q. Why did it change from an oral agreement  
2 to a written one in '21 or '22?

3 A. Well, when Nick had his issues and the  
4 DOJ was in it was decided that it was better to  
5 put people on W-2s versus 1099s. So contracts  
6 were being drawn up and I was given one at that  
7 time.

8 Q. So when you said Nick had his issues,  
9 what were Nick's issues you were aware of in '21?

10 A. He was arrested I believe in 2021.

11 Q. Was it because of this NRIA situation --

12 A. Yes.

13 Q. -- or some other?

14 A. Yes, NRIA.

15 Q. So how long after Nick was arrested did  
16 you continue to work for NRIA?

17 A. I left there in August 2022.

18 Q. Do you know when Nick was arrested?

19 A. I believe 2021, I think earlier that  
20 year.

21 Q. So when Nick was arrested did he come  
22 back to work after he was released from jail?

23 A. He was at work a while, maybe a month if  
24 that and then he decided it was better to not be  
25 associated with the company at the location, so

1 he wanted to work independently out of his house.

2 Q. So after Nick was arrested did you  
3 continue to head up the marketing department?

4 A. I never headed up the marketing  
5 department.

6 Q. So back to this document that's in front  
7 of you. Did you file tax returns for the years  
8 2018 through 2020?

9 A. Um-hum, yes.

10 Q. That's number 7.

11 A. Yes.

12 Q. Did you produce those today?

13 A. No, I didn't. My fault.

14 Q. I think it's all your fault that you  
15 didn't produce any of these things.

16 A. Yes. I admitted it.

17 Q. You don't think it's Aneca's fault?

18 A. I admitted it. It's my fault. I didn't  
19 bring the documents.

20 Q. Did you look for them?

21 A. I had them, yes.

22 Q. You had them and you didn't produce  
23 them?

24 A. No, I didn't.

25 Q. Why is that, sir? Why do you think it's

1 okay for you to disobey a subpoena?

2 A. I never said I thought.

3 Q. Why do you think it's okay to disobey a  
4 subpoena is the question?

5 A. I don't have an answer for that.

6 Q. Do you have any periodicals,  
7 publications, ads or other articles where you  
8 personally or publicly stated to investors a  
9 state of return?

10 A. No. It was not my job.

11 Q. You've never published any documentation  
12 anywhere where you said that NRIA was returning  
13 12 percent to investors? You never did that?

14 A. I never published anything like that.

15 Q. Do you have any scripts or any  
16 narratives that you might have created for any  
17 advertising?

18 A. I never created those.

19 Q. How about the phrase "real estate done  
20 right" you didn't create that?

21 A. That was Nick.

22 Q. How about "returning 12 percent to  
23 investors at this time"?

24 A. Did you hear what I said?

25 Q. I'm asking you a different question.

1 A. No.

2 Q. That's a different statement.

3 A. No, I did not produce any of those  
4 statements.

5 Q. How about this statement of "producing  
6 12 percent returns to investors at this time"?

7 A. No.

8 Q. You didn't ever write that or publish  
9 that anywhere?

10 A. I never published that.

11 Q. Did you retain any of the materials you  
12 used for your presentations to investors in India  
13 that were interested in the E85 program?

14 A. EB-5 program, no.

15 Q. Where would you have kept those  
16 documents when you were working?

17 A. On my company computer.

18 Q. Did you have a laptop?

19 A. Yes.

20 Q. And did you retain that laptop?

21 A. It was my personal laptop, yes.

22 Q. So your laptop could have information on  
23 it from back when you worked at NRIA?

24 A. It's possible, yes.

25 Q. And you didn't -- again you didn't look

1 on that computer for one single document from  
2 that subpoena, right?

3 A. Correct.

4 Q. How about any communications between you  
5 and Renascent Enterprises, would they be on your  
6 computer?

7 A. Probably.

8 Q. Did the Trustee ever ask you to give  
9 that computer back?

10 A. It was my personal computer.

11 Q. How about any communications between you  
12 and Renascent Enterprises or its principals  
13 relating to advertising programs set up through  
14 or to be administered by Renascent Enterprises in  
15 connection with NRIA, any documents like that?

16 MS. LASLEY: You went through that last.  
17 I guess you're reading it from the subpoena, so I  
18 can read it.

19 MR. GEORGE: Yeah. It's number 12.

20 Q. Number 12, sir. Could those documents  
21 also be on your computer?

22 A. Probably not. I don't have any access  
23 to my old accounts via email. If anything my  
24 computer was more for communicating via email  
25 when I was in India.



1 Q. Have you been contacted by the SEC?

2 A. No.

3 Q. Have you been contacted by the  
4 Department of Justice?

5 A. Yes.

6 Q. Who at the Department of Justice  
7 contacted you?

8 A. I have no idea their agents' names  
9 anymore. It's been over two and a half years.

10 Q. Who was that at the Department of  
11 Justice?

12 A. Like I said I do not have the agent's  
13 name anymore.

14 Q. I didn't ask you the agent's name. I  
15 asked you the agency's name?

16 A. The FBI. Speak clearer next time.  
17 Thank you.

18 Q. The Department of Justice was very  
19 clear. You just didn't listen, FBI, and you  
20 don't remember the agent at the FBI? Do you  
21 remember what office it was out of?

22 A. No. It was two and a half years ago.

23 Q. Do you know whether they were out of the  
24 Newark office?

25 A. Maybe. I cannot confirm that one way or

1 another.

2 Q. Did they come see you in Point Pleasant  
3 or did you go see them?

4 A. Why Point Pleasant?

5 Q. Where do you live?

6 A. New Jersey, North Jersey, Lincoln Park.

7 Q. Did they come see you in Lincoln Park?

8 A. Yes.

9 Q. Showed up at your house?

10 A. Yes.

11 Q. Did they have a warrant?

12 A. Nope.

13 Q. How many agents?

14 A. Two.

15 Q. Did you give the FBI any statements?

16 A. No. It was just a general conversation.  
17 They were just curious to know what I did at NRIA  
18 and he let me know that they were looking to  
19 arrest Nick.

20 Q. What were the nature of the  
21 conversations?

22 A. Friendly.

23 Q. I mean did they ask you did you know  
24 what was going on?

25 A. They just said we're here. We want to

1 know about NRIA. We want to know about Nick.  
2 Tell us what you do. And at the end of the day  
3 he said just to let you know we're going to be  
4 arresting him. I said okay.

5 Q. Have you ever received a target letter  
6 from any governmental agency?

7 A. I don't know what a target letter is.

8 Q. A letter that is telling you that you  
9 may be subject to criminal charges?

10 A. No.

11 Q. Again number 16 we asked for drafts of  
12 the declarations and you didn't look for or  
13 produce those, right?

14 MS. LASLEY: Objection.  
15 Mischaracterizes.

16 A. No.

17 Q. Did you have any documents that you were  
18 relying on in order to try to create the  
19 declaration for the Trustee?

20 A. No.

21 Q. So the statements that you made in there  
22 are basically from your recollection, not from  
23 any documentation that was shown from you or any  
24 documents --

25 A. Correct.

1 Q. -- from the company?

2 A. Correct.

3 Q. Did you have any market studies or any  
4 other information you used to try to formulate  
5 the statements in the declaration?

6 A. No.

7 Q. Have you ever done a market study, ever  
8 conduct one?

9 A. No.

10 Q. Number 19, any documentation that shows  
11 the role that you had in what the Trustee is now  
12 calling the largest Ponzi scheme in New Jersey,  
13 including any communications between you the  
14 principals of NRIA discussing the debtor's  
15 financial condition?

16 A. No.

17 Q. No, what, you don't have any?

18 A. No, I don't have any.

19 Q. When you were working at the company did  
20 you ever email with Nick or the other principals  
21 about the financial condition of the company?

22 A. No. As far as I was aware everything  
23 was rosey.

24 Q. All the way up to the end in August of  
25 '22?

1 A. We knew that no more money was coming in  
2 and obviously the company was in dire straits.

3 Q. You knew in 2021, right --

4 A. Yeah.

5 Q. -- that there were problems because Nick  
6 got arrested?

7 A. Yeah. We knew that.

8 Q. And when Nick got arrested did you write  
9 him any emails and say what the heck is going on,  
10 what did you get arrested for?

11 A. No. Because he came out and we all met  
12 at the office.

13 Q. Did he tell you that the government was  
14 accusing him of conducting a Ponzi scheme?

15 A. Not at that time.

16 Q. Did he later tell you that?

17 A. He never admitted that was a Ponzi  
18 scheme.

19 Q. What did he tell you he got arrested  
20 for?

21 A. He signed a letter of intent with a  
22 president of a bank's name and signature on it.  
23 He forged the signature.

24 Q. He forged the signature of a bank  
25 officer on what, a loan commitment?

1 A. LOI, letter of intent.

2 Q. Did you ask him why he forged the name  
3 on a letter of intent?

4 A. I didn't need to ask him. He told us,  
5 told everybody.

6 Q. What did he tell you?

7 A. He basically said he was waiting for an  
8 LOI to come in. It was late. One of the  
9 investors wanted to put money into a project.  
10 Instead of waiting he decided he was going to  
11 forge it or give it to the investor so they would  
12 give the money.

13 Q. You knew at that time that he had forged  
14 a document for the purposes of inducing an  
15 investor to invest money, right?

16 A. At that time that's what I was told,  
17 yes.

18 Q. Yet you stayed there for another year,  
19 right?

20 A. At the end the day, yes.

21 Q. So you knew he was defrauding people and  
22 you continued to work for him for another year,  
23 right?

24 A. Yes. But I was working for Rey, not  
25 him. Rey owned the company.

1 Q. So even though he was the principal and  
2 owner in the company your position is you were  
3 working for Rey. Even though he was making  
4 financial decisions and defrauding banks your  
5 position was you weren't working for the company,  
6 you were working for Rey?

7 A. I was working for the principal of NRIA  
8 which was Rey Grabato, not Nick Salzano.

9 Q. But your employer was NRIA, neither of  
10 those individuals, right?

11 A. My employer was NRIA.

12 Q. Have you filed any other declarations in  
13 the bankruptcy case?

14 A. No.

15 Q. Why didn't you quit right away when you  
16 found out that Nick was defrauding people?

17 A. I didn't believe he was defrauding  
18 people.

19 Q. Well, he got arrested and he told you he  
20 forged an LOI to get somebody to invest. That's  
21 not clear evidence to you -- excuse me, that's  
22 not clear evidence to you that he's defrauding  
23 people, that he signed someone's name falsely on  
24 a document to get somebody to invest and that's  
25 not evidence to you that he's defrauding people?

1 A. No. I mean do you want me to elaborate?

2 Q. No, I don't. You answered. You  
3 mentioned Mr. Barry. How often do you talk to  
4 Mr. Barry?

5 A. I don't know. A couple times.

6 Q. A couple times what, a week, a day, a  
7 month?

8 A. A couple times in a month maybe. I  
9 don't know. A couple months.

10 Q. Why don't you keep saying I don't know?  
11 You do or you don't.

12 A. Because I don't know. I don't write  
13 down, oh, I talked to Rick Barry today. I talked  
14 to Rick Barry an hour ago.

15 Q. But you talked to him a few times a  
16 month?

17 A. Maybe two, three times.

18 Q. And has that been consistent since --

19 A. No.

20 Q. Can you let me finish. Has that been  
21 consistent --

22 A. No.

23 Q. -- since you first started talking to  
24 Mr. Barry?

25 A. Yes.



1 Q. So when you said no --

2 A. No, no, let me correct that statement.

3 I talked to Rick Barry like I said originally a  
4 couple months ago, a year ago maybe. And then he  
5 asked me to come meet him there which we did.

6 Then he calls me every so often because of this.

7 That was it. And this is representing that.

8 Q. When you say this what are you saying?

9 A. Your subpoena.

10 Q. Is representing what?

11 A. That's the reason why I was talking to  
12 Rick Barry.

13 Q. What did you talk to him about with  
14 respect to the subpoena?

15 A. He was just letting me know I was  
16 requested to come here.

17 Q. How did he know that?

18 A. How do I know?

19 Q. Was he communicating with the Trustee?

20 A. How do I know?

21 Q. He's never told you he's communicated  
22 with the Trustee?

23 A. Not my wheelhouse to talk to him.

24 Q. How about when the deposition got  
25 continued, wasn't it Mr. Barry that was

1 communicating with the Trustee's office about  
2 that?

3 A. I guess so, yeah.

4 MS. LASLEY: I object to form in terms  
5 of Trustee's office.

6 Q. The Trustee's lawyers. Did you want me  
7 to rephrase that?

8 A. Which is fine. Go ahead.

9 Q. Was Mr. Barry communicating with you as  
10 an intermediary between you and the Trustee's  
11 lawyers about the scheduling of the depositions?

12 A. Correct.

13 Q. What did Mr. Barry tell you about the  
14 deposition itself?

15 A. He asked me to come down and tell them  
16 what I know about the situation.

17 Q. He asked you to come down to him?

18 A. No, come down.

19 Q. To appear at the deposition?

20 A. Yes.

21 Q. He asked you to appear?

22 A. He told me that I was going to be  
23 getting a subpoena and I'm going to be needed to  
24 appear at this deposition based upon the  
25 subpoena.

1 Q. How did Mr. Barry know you were getting  
2 a subpoena?

3 A. I don't know.

4 Q. Once you found out that Nick had  
5 defrauded a bank in order to induce investors to  
6 put in money, did you have any discussions with  
7 the person that you said you were actually  
8 working for about that?

9 A. Rey Grabato?

10 Q. Yes.

11 A. He was aware of it.

12 Q. Did you say to him what's going on,  
13 isn't this a bad thing?

14 A. The way it worked was when Nick got out  
15 of jail we all went back to the office and he  
16 explained the situation that the original LOI  
17 should have come in. It was late. He was trying  
18 to do a shortcut which was wrong and he  
19 understood that he's going to pay the  
20 consequences.

21 Q. What was the letter of intent, what bank  
22 was it from, do you recall?

23 A. I don't recall.

24 Q. Was it from a bank or some other  
25 financial institution?

1 A. It was a bank as far as I was aware.

2 Q. Was the letter of intent a commitment to  
3 put money into NRIA?

4 A. It was to loan money I believe.

5 Q. Were you ever a person who was involved  
6 with the banking connections --

7 A. No.

8 Q. -- for NRIA?

9 A. No. Let me rephrase that. When you say  
10 banking connections --

11 Q. Didn't you arrange loans through the  
12 banks?

13 A. I used to be a mortgage banker. I used  
14 to take care of that in my prior position working  
15 for mortgage companies and my own mortgage  
16 company. Yes, I have. But the LOI was a  
17 temporary letter of intent to loan money.

18 Q. That's not what the question was, sir.

19 A. Sorry. Repeat the question.

20 Q. The question was didn't you have --  
21 weren't you the person at NRIA who handled  
22 banking relations?

23 A. No. I was not arranging loans.

24 Q. What were you doing with the banks?

25 A. When we had issues with the banks, TD

1 Bank was shutting us down, did not want to keep  
2 our money in the bank anymore. I was trying to  
3 find other banks to take our accounts.

4 Q. Why did TD Bank not want to handle your  
5 accounts anymore?

6 A. For whatever reason we were on a watch  
7 list. I guess they didn't want to do business  
8 with us.

9 Q. When you went to the other banks were  
10 you able to find someone to take over TD Bank?

11 A. We had occasions where we were approved  
12 and down the road they cancelled the approval.

13 Q. When you made the application you never  
14 told them that Nick had been arrested for  
15 defrauding a bank, right?

16 A. I don't remember the conversation.

17 Q. You would clearly remember if you were  
18 sitting with a bank officer whether you told him  
19 Nick was arrested for fraud, wouldn't you?

20 A. We explained the situation.

21 Q. What banks did you go to to explain that  
22 situation to?

23 A. I believe it was Signature.

24 Q. Where are they?

25 A. New York City.

1 Q. Who were the officers at Signature?

2 A. I don't remember.

3 Q. When was that?

4 A. '21, '22. I know Rey had a relationship  
5 with Bank of America.

6 Q. I want to talk about you specifically.

7 A. All right.

8 Q. Who did you go to besides Signature?

9 A. I believe it was PNC.

10 Q. Again do you know who the officer was?

11 A. No.

12 Q. You recall specifically sitting down at  
13 the time that you requested to move the accounts  
14 and telling them that Nick was arrested for  
15 fraud?

16 A. I never requested to remove the  
17 accounts. All my job was to make the connection  
18 and talk to somebody.

19 Q. Did it concern you that you were trying  
20 to make the connection for a company that was  
21 defrauding people for them to go to a different  
22 bank where that opportunity might also appear?

23 A. At the time defrauding somebody wasn't  
24 on the table.

25 Q. When you say wasn't on the table what do

1 you mean by that?

2 A. There was no correlation. People saying  
3 they were being defrauded. We weren't frauding  
4 anybody.

5 Q. You mean investors?

6 A. Investors.

7 Q. But Nick was trying to defraud an  
8 investor when he created that false document,  
9 wasn't he?

10 A. The lady got her money back.

11 Q. That's not what I asked you whether she  
12 got her money back or not isn't the question.

13 A. Okay.

14 Q. You knew he was creating a false  
15 document in order to get an investor to put in  
16 money. You knew it. You admitted it three times  
17 so far.

18 A. Yes. That's the fourth time I admitted  
19 it.

20 Q. And it didn't concern you that this  
21 fraud that was running NRIA was asking you to  
22 move the accounts to another bank where  
23 conveniently the fact that he had been arrested  
24 was not disclosed initially?

25 A. Correct.

1 Q. You were waiting for the banks to find  
2 out themselves that they were dealing with  
3 someone who was a fraud, right?

4 A. No comment.

5 Q. That's a question. There's no comment  
6 in a deposition.

7 A. Oh, there isn't? Okay. Thank you.

8 Q. What's the answer?

9 A. No.

10 (Off the record)

11 MS. LASLEY: You're marking this La  
12 Mattina 7?

13 MR. GEORGE: Yes.

14 BY MR. GEORGE:

15 Q. Have you ever seen that document before,  
16 sir?

17 A. I wrote it, yes.

18 Q. And does this accurately reflect your  
19 work history and experience?

20 A. Correct.

21 Q. So the first entry is the NRIA entry and  
22 it says you're the chief operating officer,  
23 right?

24 A. Correct.

25 Q. Who was above you in the hierarchy at



1 the company?

2 A. Rey Grabato was CEO.

3 Q. So he was CEO and you were COO?

4 A. Correct.

5 Q. Was there anybody between you and  
6 Mr. Grabato in the hierarchy of the officership?

7 A. Nick -- Rey had Nick as his consultant  
8 to oversee the company.

9 Q. Why was Nick a consultant as opposed to  
10 an employee of the company?

11 A. Not my call. I don't know.

12 Q. When you started at the company were you  
13 aware of Nick?

14 A. Yes.

15 Q. Did you know when you started at the  
16 company he had a prior conviction for fraud?

17 A. No.

18 Q. Did you learn that later?

19 A. Yes.

20 Q. When?

21 A. 2021.

22 Q. So now you learned that he gave -- he  
23 forged a document to a bank to induce an investor  
24 to invest and that he had a prior criminal  
25 conviction and you learned that in 2021 and you

1 stayed there all the way through 2022, right?

2 A. Yes.

3 Q. And continued to collect money from  
4 investors, right?

5 A. Yes.

6 Q. Do you have any reason to believe that  
7 Javier knew this guy defrauded a bank?

8 A. No.

9 Q. Do you have any reason to believe that  
10 Javier knew he had a criminal conviction?

11 A. No.

12 Q. But you implied in your declaration that  
13 there was something nefarious between the guy you  
14 knew was a fraud and my client to try to make it  
15 look like he was stealing from the company like  
16 your boss was, right?

17 A. I have no idea.

18 Q. How did you try to determine Javier's  
19 margins on his sales?

20 A. I have no idea.

21 Q. You never tried to determine his  
22 margins, did you?

23 A. No.

24 Q. When an advertising campaign was being  
25 done were you the person who put it out to bid?

1 A. Nick would say --

2 Q. I asked you a question.

3 A. No.

4 Q. Were you the person who put it out the  
5 bid?

6 A. No.

7 Q. So let's go through your resume and you  
8 tell me what in here is correct and what's  
9 incorrect. Okay?

10 A. Go ahead.

11 Q. Did you coordinate with all the  
12 department heads on critical issues in their  
13 departments?

14 A. Yes.

15 Q. Was there a financial department?

16 A. Accounting department, yes.

17 Q. You coordinated with them as the COO,  
18 right?

19 A. Define coordinating.

20 Q. You wrote it. What's it mean?

21 A. That means we talked to them.

22 Q. What were the critical issues in the  
23 financial department, cash flows?

24 A. Sometimes, yes.

25 Q. So you knew about the fact that at

1 certain times there were cash flow shortages,  
2 right?

3 A. Not all the time, no.

4 Q. I didn't say all the time. You knew  
5 that on occasion there were cash flow problems?

6 A. Occasionally there were issues, yes.

7 Q. You assisted the CEO. Hold on a second.  
8 It says, including accounting, right? So you  
9 coordinated the accounting, you coordinated the  
10 media, you coordinated accounts payable and  
11 others, right?

12 A. Um-hum. Yes.

13 Q. You assisted the CEO in the daily  
14 function of the company?

15 A. Correct.

16 Q. You did contract reviews. What kind of  
17 contracts were you reviewing?

18 A. Sales of condos, per se, or developments  
19 we were marketing at the time.

20 Q. Investment sales?

21 A. No.

22 Q. No what?

23 A. No, I did not do investment sales.

24 Q. Why does it say assisted the CEO in his  
25 daily functions including investment sales. Was

1 that a lie or are you just backing away from it  
2 now because it puts you in a bad light?

3 A. No.

4 MS. LASLEY: Objection to form.

5 Q. That's fine. Answer it.

6 A. Investment sales meaning I went to Art  
7 and A.J. and said how's it going with the sales  
8 or is everybody working and stuff like that.  
9 That's what I meant by coordinating investment  
10 sales. I did not directly deal with any  
11 investors at any time directly in the U.S. for  
12 investment sales.

13 Q. But in India you did, right?

14 A. Yes.

15 Q. You went to India and you directly  
16 solicited people to invest and you stated to them  
17 directly that you were giving 12 percent when  
18 you went to India, didn't you?

19 A. No. I was marketing EB-5 platforms at  
20 the time when I went to India before we started  
21 to try investment offices.

22 Q. And those were personal meetings between  
23 you and Tanvi Chandra --

24 A. Right.

25 Q. -- and investors in Southeast Asia?

1 A. Correct.

2 Q. You went there and you made  
3 representations to them about the nature and  
4 quality of the investments, didn't you?

5 A. At the time I knew that the quality was  
6 there at the time.

7 Q. You didn't know because it wasn't there,  
8 was it?

9 A. At the time it was there.

10 Q. Oh, maybe that's where the quote came  
11 from "returning 12 percent at the time." That  
12 was your quote, wasn't it Glenn?

13 A. No.

14 MS. LASLEY: Objection to form.

15 Q. Reviewed and approved marketing  
16 materials involving the parent company and the  
17 subsidiaries. So everything that got marketed  
18 you approved?

19 MS. LASLEY: Objection.

20 A. Did I approve it? It was Nick or Rey  
21 approved the finals.

22 Q. He finally approved it but it says here  
23 that you did it with your assistance that you  
24 provided. You reviewed and approved marketing  
25 materials?

1 A. Okay.

2 Q. Okay. Reviewed the metrics on current  
3 advertising and social media campaigns for  
4 projects. What did that involve?

5 A. That means when we had Katey Kana there  
6 and she was getting the marketing numbers we all  
7 sat down and looked at how different ads were  
8 performing.

9 Q. How did you -- what did you do after you  
10 saw how those ads were performing, what kind of  
11 steps would the company take in response to that?

12 A. We all discussed how different ads were  
13 performing and ultimately everything went to Nick  
14 to decide what he wanted to continue to market or  
15 not.

16 Q. Raised \$8.5 million for Green Card  
17 investment?

18 A. Yes.

19 Q. You raised that money, right?

20 A. I assisted in it, yes.

21 Q. It doesn't say assisted. It says  
22 raised. Like you're taking credit for it here.  
23 Now you're saying you didn't do it yourself, you  
24 did it with other people, but here you said you  
25 did it yourself. You raised \$8.5 million, right?

1 A. I'm a miracle worker, aren't I?

2 MS. LASLEY: Okay. Let's just answer  
3 the question.

4 Q. Is that a true statement?

5 A. Yes, it is very true.

6 Q. Those \$8.5 million in investors are  
7 people who never got their money back, right?

8 A. Wrong. It's a Green Card. They're  
9 waiting to get their Green Card. Then they get  
10 their money back. If you knew something about  
11 EB-5 you might --

12 Q. You said coordinated work  
13 internationally in India, Dubai and Thailand for  
14 fund investors, EB-5 and B-1 investors. What are  
15 B-1 investors?

16 A. It's a program where B-1 I believe you  
17 can open a business in the states if I remember  
18 right.

19 Q. Did you live overseas for a period of  
20 time?

21 A. Probably around eight, nine months I was  
22 overseas maybe two and a half weeks, three weeks,  
23 came back for 10 days, went back overseas again.

24 Q. So you didn't live there for six months,  
25 you went back and forth for six months?



1 A. Correct.

2 Q. It's not what it says here.

3 A. Okay.

4 Q. It says while living overseas for a  
5 period of six months?

6 A. Correct.

7 Q. That's a lie, isn't it?

8 A. No.

9 Q. It's not true?

10 A. It's interpretation.

11 Q. So traveling back and forth for six  
12 months could be interpreted to mean you lived  
13 there for six months, right?

14 A. Correct.

15 Q. And it says you brought in international  
16 investments?

17 A. Correct.

18 Q. How did you learn about the opportunity  
19 with NRIA?

20 A. How was I hired?

21 Q. Yes.

22 A. I got a call from Nick.

23 Q. From Nick?

24 A. Yeah.

25 Q. Not from Rey?

1 A. No. Nick.

2 Q. How did you know Nick?

3 A. He answered an ad maybe two years prior  
4 to me working for him. He was looking for  
5 salespeople. I met with him. He goes I think  
6 you have a better opportunity maybe working with  
7 me doing mortgages for some of my people that I'm  
8 working with. So we became associates. He  
9 referred business to me. In regards to taking  
10 out construction loans in some of the projects in  
11 Philly. When I say taking out construction I  
12 mean refinancing construction loans and getting  
13 an end mortgage for the investors.

14 Q. So initially what you're saying is that  
15 your business relationship with NRIA was based on  
16 you refinancing certain projects that Nick  
17 already had going?

18 A. Certain investors.

19 Q. Investors?

20 A. Investors.

21 Q. How would you refinance investors?

22 A. The way the project program worked at  
23 the time Nick would buy a piece of property,  
24 subdivide it. The investors would get a  
25 construction loan, buy the project, so when the

1 project got a CO I would refinance the  
2 construction money and get a standard 30 year or  
3 15 year fixed mortgage on it.

4 Q. And you did that after the building was  
5 built on the project?

6 A. Correct.

7 Q. So there was the construction financing  
8 and then you got the permanent financing?

9 A. Correct.

10 Q. This is 9, La Mattina number 9. Have  
11 you ever seen this document before?

12 A. It's LinkedIn, my LinkedIn.

13 Q. You've seen it before?

14 A. I saw my LinkedIn. I did not see this  
15 document, per se. I've seen LinkedIn.

16 Q. Does this look like your LinkedIn page?

17 A. Yes.

18 Q. This is dated -- I'll represent to you  
19 and if you look at upper corner -- 1/22/24. Do  
20 you see that?

21 A. Um-hum.

22 Q. You've made changes to it since then,  
23 haven't you?

24 A. Correct.

25 Q. You've deleted a lot of the information

1 in here about NRIA, didn't you?

2 A. Correct.

3 Q. You did it before or after you got the  
4 subpoena?

5 A. It was an ongoing process.

6 Q. Before or after you got the subpoena,  
7 when did you start?

8 A. I don't know.

9 Q. You didn't like what the original  
10 LinkedIn said about your role in NRIA, did you,  
11 Glenn?

12 A. It's called updating my profile.

13 Q. And deleting your association with a  
14 company that defrauded people out of 600 million  
15 dollars, right?

16 A. Is that --

17 Q. That was a side issue?

18 A. -- a question?

19 Q. No, it wasn't.

20 A. Okay. Thank you. I want to make sure I  
21 answer them correctly.

22 Q. If you go on the second page of this  
23 document, do you see that?

24 A. Um-hum,

25 Q. It says Glenn A. La Mattina was the

1 chief operations officer for a national  
2 development firm and investment fund manager. Is  
3 that NRIA you're talking about?

4 A. Correct.

5 Q. When you spell your name do you put the  
6 La and the M together or do you put a space in  
7 between that?

8 A. Usually I space it.

9 Q. It says here Mr. La Mattina has served  
10 on the executive teams in different capacities  
11 for the past seven years. Do you agree with  
12 that?

13 A. Not for the whole past seven years, no.

14 Q. But how about the rest of it? That you  
15 served on the executive teams in different  
16 capacities?

17 A. Correct.

18 Q. It says Mr. La Mattina oversaw the sales  
19 and marketing efforts for the firm globally,  
20 correct?

21 A. Correct.

22 Q. Under experience, do you see that, two  
23 of six.

24 A. Okay.

25 Q. There's a company call X-On Consultants

1 LLC?

2 A. Correct.

3 Q. And it says under it I was instrumental  
4 in the development of a national real estate fund  
5 and in the development and management over 1.2  
6 billion dollars of, of course, it says see more.  
7 Are you making reference to NRIA in that  
8 paragraph?

9 A. Correct.

10 Q. Under chief operating officer can you  
11 read what you wrote there for your job  
12 description, read it out loud.

13 A. Responsible for the daily operations of  
14 NRIA and its global EB-5 investment strategies.  
15 Established NRIA investment offices in India,  
16 Dubai. Oversaw mortgage and production -- I'm  
17 just looking where --

18 Q. That's fine. That's all I needed you to  
19 read to. It cuts off there at the end. Were  
20 there other offices other than India and Dubai?

21 A. We were looking at opening one in  
22 Thailand at the time.

23 Q. This is going to be La Mattina 3. Do  
24 you have that document in front of you, sir?

25 A. Yes.

1 Q. Do you have an indication here I'm  
2 reaching out to share an exciting investment  
3 opportunity to Prime Equity a renowned national  
4 development company. What's Prime Equity?

5 A. It's a company that I contracted to do  
6 consulting work for.

7 Q. What kind of consulting are you doing?

8 A. Helping them grow their funds.

9 Q. Is it like what NRIA was doing?

10 A. Like a real estate fund, yes.

11 Q. Are you doing the same things for Prime  
12 Equity today that you were doing for NRIA?

13 A. No.

14 Q. Are you still working for Prime Equity?

15 A. No.

16 Q. How long did you do that?

17 A. Probably about two months.

18 Q. Why was it so short?

19 A. They didn't want to spend the money to  
20 do what I thought was a better campaign to help  
21 grow the company.

22 Q. You mean advertising?

23 A. Advertising, yes.

24 Q. Have you ever been an advertising  
25 executive?

1 A. No.

2 Q. Do you have any media experience?

3 A. Other than my own, no.

4 Q. You mean other than your own media?

5 A. My own media experience, marketing my  
6 own companies.

7 Q. Have you ever been an ad agency  
8 executive?

9 A. No.

10 Q. An ad agency employee?

11 A. No.

12 Q. A marketing agency executive?

13 A. No.

14 Q. A marketing agency employee?

15 A. No.

16 Q. An advertising broker?

17 A. No.

18 Q. An advertising agent?

19 A. No.

20 Q. This is number 4. Mr. La Mattina, have  
21 you ever seen -- do you need more time to look at  
22 it?

23 A. Go ahead.

24 Q. Have you ever seen this before?

25 A. No.



1 Q. Do you know what Renascent Enterprises  
2 is?

3 A. Yes.

4 Q. What is that?

5 A. It's an advertising marketing company  
6 owned by Tanvi Chandra, T-a-n-v-i, and then  
7 Chandra, C-h-a-n-d-r-a.

8 Q. Did you bring Renascent Enterprises into  
9 NRIA or did NRIA seek out Renascent Enterprises,  
10 how did Renascent Enterprises begin being  
11 involved with NRIA?

12 A. I have no idea. I met Renascent after I  
13 was working there.

14 Q. You mean after you quit working there?

15 A. No. I met Renascent from -- Tanvi was  
16 working there prior. I started after that.

17 Q. Tanvi was working at NRIA?

18 A. No, at Renascent. Renascent was a  
19 marketing agency for NRIA. I met them after I  
20 started working there.

21 Q. After you started working at NRIA?

22 A. Yes.

23 Q. And at the time you started working at  
24 NRIA was she providing services through Renascent  
25 to NRIA?

1 A. I believe so, yes.

2 Q. Do you recall what that was?

3 A. Not at the time when I first met, no.

4 Q. Can you go to page 2 of 4 of that  
5 document. Could you read that piece about NRIA?

6 A. Building a trust --

7 Q. I just meant for you to read it to  
8 yourself so I could ask you some questions about  
9 it. Is there anything in there that Tanvi said  
10 that you disagree with?

11 A. No.

12 Q. What is the exclusive project launches  
13 in celebrity -- she spelled it wrong -- but  
14 engagements, what are those, do you know?

15 A. I know she brought some Indian  
16 celebrities to introduce them to NRIA and for  
17 marketing.

18 Q. Were those celebrities people that were  
19 doing advertisements or were they investors?

20 A. I believe they were doing  
21 advertisements.

22 Q. They would have been the talent, right?

23 A. The talent, yes.

24 Q. Would you agree with her that the EB-5  
25 project -- strike that. Would you agree with her

1 as a result of her efforts and Renascent's  
2 efforts that investor percentages increased to 20  
3 percent and South Asian percentages went up to 50  
4 percent?

5 A. I don't have the statistics. I can't  
6 confirm that.

7 Q. Do you know when you first started was  
8 NRIA already soliciting people in India?

9 A. Not in India direct but Indian nationals  
10 in the U.S.

11 Q. So there was no foreign program when you  
12 first started?

13 A. No.

14 Q. Did you set that up with Tanvi?

15 A. No. Nick set that up.

16 Q. Who set up the EB-5 program?

17 A. I worked in coordination with Nick to  
18 start doing that.

19 Q. How about Tanvi?

20 A. No. She was brought in sort of like  
21 from the marketing side of that, my  
22 understanding.

23 Q. Do you have any other relationship with  
24 Tanvi?

25 A. Other than being a friend.

1 Q. Are you a married man?

2 A. Yes.

3 Q. This is number 5. Mr. La Mattina, I'm  
4 not suggesting this is your document. I'm going  
5 to represent to you this is the Trustee's answers  
6 to discovery that we propounded upon them. I  
7 want you to go to paragraph number two if you  
8 could.

9 A. What page?

10 Q. It's page number 5.

11 A. Okay.

12 Q. If you go to number 2 the question is  
13 state all facts that show when the debtor became  
14 or was rendered insolvent. And in here it says  
15 additionally the date of the debtor's insolvency  
16 is evidenced by his financial information which  
17 establishes from at least February of 2019 the  
18 debtors were unable to meet their debts as they  
19 came due from operating revenue absent the  
20 infusion of additional investor funds through the  
21 continued perpetration of a Ponzi scheme.

22 Were you aware that in February of 2019 the  
23 company wasn't paying its debts as they came due?

24 A. No.

25 Q. Did anybody that you communicated as a

1 head of any of those departments including the  
2 financial department ever say to you hey, Glenn,  
3 we're not paying our bills back in 2019?

4 A. No.

5 Q. So in those communications you had with  
6 the heads of those departments that issue never  
7 came up, the inability to pay the debt?

8 A. No.

9 Q. Did you ever ask the heads of those  
10 departments whether bills were being paid?

11 A. In 2019 I was not in a COO position. I  
12 was a VP of operations.

13 Q. What was VP of operations, what did that  
14 person do?

15 A. Basically kept the operations moving and  
16 by that I meant making sure contracts -- let's  
17 say the sale of a house was being done or in  
18 Philly I would look at the contract, talk to the  
19 realtor, coordinate any projects that Nick wanted  
20 done for let's say research on different topics,  
21 stuff like that.

22 Q. So you went from VP of operations to the  
23 COO?

24 A. Right.

25 Q. In 2021 I think you said, right?

1           A. I believe it was 2021 when we got our  
2 contracts.

3           Q. When you did that did you sit down with  
4 all the heads of the department and say, hey, how  
5 are things going in finances, did you do that?

6           A. No. We just had a general conversation  
7 with everybody in the room to say what was going  
8 on at the time.

9           Q. As a person who was supposed to be  
10 overseeing the department heads as what you said  
11 in here you don't think whether they were paying  
12 bills should have been a topic of conversation  
13 between you the heads of those departments?

14          A. In 2019 it was not my place.

15          Q. I didn't say in '19. I asked you about  
16 --

17          A. When I became COO we discussed some of  
18 the issues.

19          Q. What were those issues that bills  
20 weren't being paid?

21          A. I'd have to -- I don't remember to be  
22 honest with you.

23          Q. When did you first hear that bills  
24 weren't being paid?

25          A. I guess from when Tommy was discussing

1 that with everybody.

2 Q. When was that?

3 A. Probably 2021.

4 Q. When you heard that as the COO did you  
5 ever recommend to Rey or to Nick, hey, let's stop  
6 taking people's money?

7 A. No.

8 Q. Is real estate always a safe investment?

9 A. No.

10 Q. What happens in a real estate investment  
11 when interest rates double, are they projected to  
12 produce the same kind of income?

13 A. No.

14 Q. And you know that insurance or that  
15 interest rates went from an all time high like  
16 not lower, it hasn't been lower in 30 years to  
17 now they're about 7 percent, 8 percent?

18 A. About 7, 7 and a half.

19 Q. When those interest rates went up as the  
20 person who was the head of operations didn't that  
21 start to make things happen in your head about,  
22 hey, how are we adjusting our operations and  
23 paying our bills now that our interest  
24 obligations have essentially doubled?

25 A. No.

1 Q. You don't have any reason to dispute  
2 what the Trustee's response is to number 2 of the  
3 interrogatories, do you?

4 A. No. Just I wasn't aware of anything in  
5 2019.

6 Q. Fair enough. That's number 6. Just  
7 take a minute and look at that if you could.  
8 Have you seen that document before?

9 A. Yes.

10 Q. Do you know what changes you made to  
11 this document prior to it being filed?

12 A. Let me read it here a little closer. I  
13 don't remember what changes I made, no.

14 Q. So now a minute ago I asked you whether  
15 in 2019 you knew whether the bills weren't being  
16 paid and you said you didn't think you became the  
17 COO until sometime in 2020, right?

18 A. '21.

19 Q. Okay. Can you read paragraph four out  
20 loud.

21 A. On May of 2018 I was hired by National  
22 Realty Investment Advisors, NRIA, to serve as  
23 vice president of operations. I served in that  
24 role until 2019 when I was named NRIA senior VP  
25 of global operations, a role that I held in 2021.



1 (Off the record)

2 I became the chief operating officer and was  
3 ultimately laid off. A role that I held through  
4 2021 until I became the chief operating officer.  
5 I was ultimately laid off as the senior VP of  
6 global operations. I took directions principally  
7 from Thomas Nicholas, Nick Salzano -- Nick  
8 Salzano.

9 Q. Now you earlier testified you said you  
10 didn't feel like you were working for Nick. You  
11 thought you were working for Rey?

12 A. No. I was always told Rey owns the  
13 company.

14 Q. If Rey owned the company and you thought  
15 you were working for him why were you taking  
16 directions from Nick?

17 A. That's what I was told to do.

18 Q. Who told you to do that?

19 A. Nick.

20 Q. So you worked for a company and you  
21 testified earlier you thought you worked for Rey?

22 A. Right.

23 Q. And you put a statement into court that  
24 you took your directions from Nick and that Nick  
25 is the one that told to you take directions from

1 Nick, right?

2 A. Yeah. Because Rey was chief executive  
3 officer and Nick was Nick, whatever reason.

4 Q. I don't understand your answer there.  
5 Rey was the chief executive officer?

6 A. And basically Nick was his consultant  
7 and --

8 Q. So you were taking direction from Ray's  
9 consultant?

10 A. Correct.

11 Q. Not from an officer in the company?

12 A. No.

13 Q. So you did what Nick told you to do?

14 A. Correct.

15 Q. Even though he wasn't an officer of the  
16 company and you didn't consider it his company,  
17 right?

18 A. Not at the time, no.

19 Q. Not at the time you didn't consider it  
20 his company?

21 A. I did not consider it was his company  
22 because he always said Rey owned the company.

23 Q. When Nick said to you, hey, you answer  
24 to me --

25 A. Right.

1 Q. -- didn't you go to your buddy Rey who  
2 you thought owned the company and you thought you  
3 worked for said, hey, what the hell is going on  
4 here, Nick's telling me I got to answer to him?

5 A. That's the way it was.

6 Q. I didn't ask you that.

7 A. No.

8 Q. Did you go to Rey?

9 A. No.

10 Q. So you knew there was something strange  
11 going on there, didn't you?

12 A. No.

13 Q. You didn't?

14 A. No.

15 Q. You didn't think it was odd that the  
16 person that owned the company and ran the company  
17 was having you respond and take orders from his  
18 consultant?

19 A. No.

20 Q. You didn't find that odd?

21 A. Not at all.

22 Q. In paragraph five you said you traveled  
23 abroad to help attract new investors, true?

24 A. True.

25 Q. Did you actually attract new investors?

1 A. We brought people in from India, yes.

2 Q. Was that in '21 and '22?

3 A. That was 2019, 2020.

4 Q. The paragraph six it says generally when  
5 someone at NRIA, usually Nick, had an idea for a  
6 new advertisement I would submit bids to two or  
7 three advertising companies to assess the cost of  
8 implementing the idea. Is that true?

9 A. Yes.

10 Q. Who were the advertising companies you  
11 submitted bids to?

12 A. We had H&L Media, Renascent, the  
13 advertising company that was with Star Ledger  
14 which was -- I forget their name.

15 Q. Renascent, H&L Media --

16 A. Renascent, H&L.

17 Q. How did you transmit those bid requests,  
18 by email?

19 A. Yes. Or I called them and told them  
20 what was needed.

21 Q. Did they give you the proposals back by  
22 email?

23 A. Yes.

24 Q. So if you did this, if you submitted bid  
25 requests they should still be on the company's

1 servers, right?

2 A. I believe so, yes.

3 Q. When you got to the company was Javier  
4 and Media Effective doing business with the  
5 company?

6 A. Yes.

7 Q. So when you said you were instructed to  
8 include Media Effective wouldn't you have  
9 included them anyway as a party that they were  
10 already doing business with when you were  
11 soliciting bids?

12 A. Yes.

13 Q. He didn't just direct you to send it to  
14 Media. He directed you to send it to Media --

15 A. Other people, yes.

16 Q. -- Effective, H&L Media, Renascent, a  
17 lot of different people, right?

18 A. Different companies, yes.

19 Q. So when you said you were instructed by  
20 Nick to include Media Effective he asked you to  
21 include everybody?

22 A. Everybody.

23 Q. He wasn't picking Media Effective and  
24 saying send it to them?

25 A. No, he was saying send it to everybody.

1 Q. Right. When you got the bids back how  
2 did you compare them?

3 A. I just looked at the numbers and I gave  
4 it to Nick and we discussed it.

5 Q. Were they always apples to apples? You  
6 know what that means?

7 A. Yes, I know what that means. At the  
8 time they looked similar. A lot of times the  
9 prices, Renascent would be a little cheaper than  
10 Javier. Nick would always say Javier's my guy.  
11 We're going with Javier.

12 Q. There were issues with Tanvi at the  
13 company, weren't there?

14 A. There were some issues, yes.

15 Q. They had to send her a cease and desist  
16 letter, didn't they?

17 A. I believe they did, yes.

18 Q. You didn't want to send it, did you?

19 A. I don't remember.

20 Q. You don't remember --

21 A. I don't remember.

22 Q. You don't remember being written to  
23 three times being told send out that letter?

24 A. I don't remember. It's been two and a  
25 half, three years.

1 Q. Think about it. Were you resistant to  
2 sending it out?

3 A. I don't remember even why the cease and  
4 desist was sent.

5 Q. Were you aware she was holding herself  
6 out as an officer of NRIA after she'd been  
7 terminated?

8 A. No.

9 Q. Did you ever see any emails that Javier  
10 wrote to Nick and to Rey where he showed that the  
11 prices that Tanvi was charging for time on local  
12 sports events that he was getting 60 seconds time  
13 for the amount she was -- for the same amount she  
14 was charging and offering 30 seconds of time in  
15 the ads?

16 A. I don't remember, no.

17 Q. You don't remember Javier beating her  
18 badly in that?

19 A. I remember Javier did underbid her on  
20 different occasions.

21 Q. She didn't like that much, did she?

22 A. I imagine not, no.

23 Q. You were worried about it because it was  
24 hurting your efforts in India because Tanvi was  
25 upset, right?

1           A. No. She was upset but it wouldn't hurt  
2 my efforts in India. I made enough connections  
3 over there.

4           Q. You didn't need Tanvi in India is what  
5 you're saying?

6           A. Yes.

7           Q. Even though you couldn't speak the  
8 language?

9           A. They speak English.

10          Q. Even though you didn't know any of the  
11 local politicians?

12          A. No.

13          Q. When you say nine times out of 10 what  
14 does that actually mean?

15          A. I believe more times Javier's prices  
16 were higher.

17          Q. More times?

18          A. I don't know.

19          Q. When you said nine out of 10 did you  
20 have them in front of you?

21          A. No.

22          Q. So you can't --

23                MS. LASLEY: Hold on one second. We  
24 still need an answer.

25          A. Go ahead.



1 Q. So you didn't have any documents in  
2 front of you when you wrote this, you can't  
3 remember what any of the bids were?

4 A. Correct.

5 Q. And yet you're able to say nine out of  
6 10 he was higher?

7 A. Yes. General statement.

8 Q. It's a general statement. It wasn't  
9 based on anything you actually saw. It was just  
10 a recollection from over two and a half years  
11 ago?

12 A. Correct.

13 Q. It could be flawed, right?

14 A. Could be.

15 Q. Did you oppose using Media Effective at  
16 all?

17 A. No.

18 Q. How did you determine the margins that  
19 Javier was making?

20 A. I didn't.

21 Q. Then how come you're saying it included  
22 a 40 percent margin in your declaration if you  
23 never saw what he paid for it?

24 A. I was told by the investigator at that  
25 time.

1 Q. Oh?

2 A. That's what the average margins were at  
3 the time.

4 Q. Wait a minute now. This isn't of your  
5 personal knowledge, is it?

6 A. No.

7 Q. You signed a document under penalty of  
8 perjury that says I have personal knowledge and  
9 am competent to testify.

10 A. My personal knowledge was that his bids  
11 were higher but I didn't know the percentage.

12 Q. So that's not true what you wrote?

13 A. I believe not then.

14 Q. And at the time you didn't have any idea  
15 what his margins were?

16 A. Correct.

17 Q. And you still don't?

18 A. No.

19 Q. But you signed this document anyway?

20 A. Yes.

21 Q. And you weren't offered anything by the  
22 Trustee to do that, right?

23 A. No.

24 Q. You haven't been offered any kind of  
25 forbearance or anything for your cooperation,

1 right?

2 A. No.

3 Q. When you say the cost was always  
4 substantially more that's not true either, is it?

5 A. Define the word substantial.

6 Q. You wrote it.

7 A. Okay. It was more. Whether it be  
8 substantially more, I don't know.

9 Q. You said always. It wasn't always?

10 A. No. Can't be always, no.

11 Q. I just pointed out an example to you  
12 where he beat her by 50 percent.

13 A. Correct.

14 Q. Do you know what the card rate is for  
15 advertising?

16 A. I'm going to say probably between 10 and  
17 15 percent.

18 Q. No, no, I didn't ask you what margins  
19 were. I asked you what's the card rate in  
20 advertising, do you know what that is?

21 A. No.

22 Q. How are you comparing bids when you  
23 don't even know what the card rate is?

24 A. I'm just saying from what I was told.

25 Q. What you were told by the Trustee's

1 lawyers --

2 A. No.

3 Q. -- the Trustee or someone else?

4 A. No. What I was told by when we were  
5 looking over the -- Nick deciding where to go  
6 with the bids.

7 Q. Is this your sentence at the end of  
8 paragraph seven? Read it.

9 A. Which page, which document?

10 Q. The document --

11 A. Number seven?

12 Q. Yes.

13 A. All right.

14 Q. For reasons unknown to me Nick Salzano  
15 whose criminal trial begins March 5th. Did you  
16 add that?

17 A. No.

18 Q. Who put that in there?

19 A. I believe -- I guess the investigators.

20 Q. Those aren't your words, right?

21 A. No. I wasn't aware of when his trial  
22 was going to start I believe.

23 Q. Do you know what personal knowledge is?

24 A. Yes.

25 Q. Do you know you signed this under a

1 penalty of perjury, do you know that, sir,  
2 because that's serious?

3 A. Okay.

4 Q. Did you know you signed it under penalty  
5 of perjury?

6 A. No.

7 Q. Well, what's the bottom say, pursuant to  
8 28 USC I declare under penalty of perjury --

9 A. Yes. Okay, fair enough.

10 Q. And it's replete with false statements,  
11 isn't it?

12 A. Obviously, yes.

13 Q. So when Tanvi was bidding at a price  
14 twice what Javier was for spots you didn't have  
15 any problems with giving Tanvi business, did you?

16 A. I wouldn't decide who got business. It  
17 was Nick's decision.

18 Q. Do you have any information sitting here  
19 today that there was some kind of nefarious  
20 relationship between Mr. Torres and Mr. Salzano  
21 that caused the business he gave him other than  
22 your own speculation?

23 A. No.

24 Q. Do you have any reason to think he was  
25 kicking money back to Nick?

1 A. No.

2 Q. These are direct response  
3 advertisements, right?

4 A. Um-hum.

5 Q. Do you know what a direct response is?

6 A. You see the ad and somebody calls.

7 Q. Right. As opposed to like a commercial  
8 for Coca-Cola where it's just about how many  
9 people see it?

10 A. Right.

11 Q. So when someone sees an ad for NRIA do  
12 they just sign up and invest or does somebody  
13 have to close that transaction?

14 A. Someone is going to call and they'll  
15 talk to a representative and hopefully they'll  
16 close.

17 Q. So the ad itself just gets interest, it  
18 doesn't result in anybody investing?

19 A. Correct.

20 Q. So the fact that someone saw an ad that  
21 was put on by NRIA doesn't in effect mean they  
22 were an investor, right?

23 A. Correct.

24 Q. Were you a closer?

25 A. No.

1 Q. Who were the closers?

2 A. We had Art, A.J. and 15, 20 other  
3 people.

4 Q. Who wrote the scripts for them?

5 A. I believe Nick did.

6 Q. Did you review those scripts?

7 A. Nope.

8 Q. Never reviewed them?

9 A. I read them, yes.

10 Q. Oh, you read them.

11 A. But I didn't review them. If you want  
12 to use the word review means you took it apart  
13 and go through it piece by piece.

14 Q. You read them and you were aware of the  
15 context?

16 A. Yes.

17 Q. Did you ever make any suggested changes?

18 A. No.

19 Q. Who authorized checks to be cut at the  
20 company at NRIA?

21 A. It would be Rey or Nick.

22 Q. Did you ever tell Rey, hey, don't pay  
23 Javier, he's overcharging?

24 A. No.

25 Q. Did you ever tell Nick?

1 A. No.

2 Q. At the time you were at the company you  
3 never raised issues about Javier's rates, did  
4 you?

5 A. No.

6 Q. So this is just hindsight. You're going  
7 back in time and saying, hey, guess what, back in  
8 the day I thought this. I never told anybody but  
9 I thought it, right?

10 A. I dealt with Javier in marketing and  
11 advertising for a period of --

12 Q. Sir, that's not the answer to the  
13 question.

14 MS. LASLEY: Hold on. Let him finish.

15 A. Let me finish. I'm going to give you an  
16 answer but it's a little more revolved --  
17 involved. Okay? I became involved with the  
18 advertising and marketing more probably in, end  
19 of 2019 into 2020 when I was in India and when I  
20 got back in the states in 2020.

21 Katey Kana was hired to handle the  
22 advertising and marketing at the time. She dealt  
23 with Javier, Tanvi, Brian Prinsell, Claudio and I  
24 was just more hearing what was going on behind  
25 the scenes between the people.



1 Q. Before we get too far I want to hand you  
2 the subpoena for your attendance at trial on  
3 April 10th. We put notice of it on the docket  
4 today. Mr. La Mattina, I just want to remind you  
5 that your testimony today is no different than  
6 you sitting on a witness stand in court.

7 A. I understand.

8 Q. Have you ever been involved with a  
9 company that did reputation salvation or  
10 reputation restoration?

11 A. Reputation management, yes.

12 Q. What was the name of that company?

13 A. I don't remember offhand.

14 Q. Was one of the things that you did as a  
15 reputation -- what was the word you used?

16 A. Reputation management.

17 Q. What would you do as a reputation  
18 manager?

19 A. I wouldn't be doing anything. Katey  
20 Kana contracted a reputation management company  
21 to oversee what could be done when Nick was  
22 arrested.

23 Q. You said you were a reputation manager.  
24 I asked you did you --

25 A. I didn't say I was a reputation manager.

1 Q. Have you been involved in reputation  
2 management services?

3 A. Not myself, no.

4 Q. But Katey Kana hired somebody?

5 A. Yes.

6 Q. Were you the person that dealt with  
7 them?

8 A. I dealt with Katey and that person.

9 Q. Who was that person?

10 A. I don't remember the name of the company  
11 or the firm that was handling it.

12 Q. Do you remember the name of the  
13 individual that you sat with?

14 A. No.

15 Q. Were some of the recommendations that  
16 names get spelled differently?

17 A. Are we talking about Nick Salzano?

18 Q. Yes.

19 A. I did nothing for that. That was not  
20 the reputation manager I was talking about. I  
21 believe Nick Salzano had other -- what word am I  
22 going to use here -- identities or personas. He  
23 was a body builder, he was a hairdresser, stuff  
24 like that on the internet.

25 Q. What I'm asking you is the company that

1 you dealt with, was one of their reputation  
2 management proposals that people spelled their  
3 names different?

4 A. No.

5 Q. Do you know that Nick had spelled his  
6 name a number of different ways?

7 A. That I found out.

8 Q. When did you find that out?

9 A. After he was arrested.

10 Q. When he came back did you continue to  
11 take directions from him at Rey's direction?

12 A. Yes.

13 Q. So when he came back you knew he was  
14 arrested for trying to defraud a bank. You knew  
15 that he was spelling his name different so people  
16 couldn't find out who he was. You knew he wasn't  
17 the owner of the company but you were directed to  
18 work for him. And when he came back from being  
19 jailed you continued to take instruction from  
20 him, right?

21 A. Correct.

22 THE VIDEOGRAPHER: We're going off  
23 record. The time is 11:20 a.m.

24 (Morning recess)

25 THE VIDEOGRAPHER: We're back on the

1 record. The time is 11:29 a.m.

2 BY MR. GEORGE:

3 Q. Mr. La Mattina, we're going to keep  
4 going here. This is La Mattina 10.

5 A. With all due respect I don't have my  
6 reading glasses.

7 Q. I'll read it for you. So have you ever  
8 seen this before, the Top 100 Magazine?

9 A. Yeah.

10 Q. Do you recall giving them an interview?

11 A. Yeah. We paid for it.

12 Q. You paid for it?

13 A. It's one of those paid kind of --

14 Q. It's kind of an advertisement?

15 A. Yeah.

16 Q. Intended to solicit people to invest?

17 A. I guess to solicit, just to market NRIA,  
18 yes.

19 Q. To solicit interest in NRIA?

20 A. Yes.

21 Q. On the bottom of it here it says I  
22 managed a team of four project managers in India  
23 and I run the firm's EB-5 visa program. True?

24 A. Yes.

25 Q. Our primary responsibility is to raise

1 foreign capital to invest in real estate  
2 development projects in the U.S. via NRIA's  
3 partnership portfolio fund. And then it says,  
4 which offers foreign investors an assured 12  
5 percent return on investment. Do you see that?

6 A. Yes.

7 Q. Did you say that?

8 A. I didn't say it but yes, that's what it  
9 says.

10 Q. It's in an article about you --

11 A. Yes.

12 Q. -- in a magazine and your picture is  
13 here?

14 A. Yes.

15 Q. And being quoted as the person who is  
16 the chief operating officer of NRIA, right?

17 A. What year was this written?

18 Q. I don't know.

19 A. Because I was not COO at the time like I  
20 said. Most likely I was still a VP.

21 Q. When did you start the EB-5 program?

22 A. 2019.

23 Q. So it was sometime after 2019, right?

24 A. Yeah.

25 Q. I mean this article?

1 A. Yeah.

2 Q. Because you're making reference to that  
3 program, right?

4 A. Correct.

5 Q. It says last year in December the EB-5  
6 minimum investment increased from 500 to 900,000  
7 to 1.8 million depending on the geographic area  
8 of the project. What's that about?

9 A. In EB-5 they have what's called target  
10 areas, employment target areas, where there's a  
11 high unemployment rate. That area is deemed,  
12 instead of investing a larger amount of money  
13 such at the time let's say 900,000, you could  
14 invest 500,000.

15 Q. So it was reducing the minimum  
16 investment?

17 A. Correct. Because of the high  
18 unemployment area.

19 Q. Because of the high unemployment area,  
20 explain that?

21 A. Because it's a government program they  
22 look at different areas that need stimulation.  
23 So if it's a high unemployment area the EB-5 is  
24 supposed to bring in 10 jobs per investment for a  
25 period of two years. At that time if you're in a

1 targeted employment area where your project is  
2 located then you can invest 500,000. If it's not  
3 in a high unemployment area you can invest the  
4 higher amount.

5 Q. I see. I understand. And who creates  
6 these designated areas, the government, the  
7 federal government?

8 A. Federal government.

9 Q. It's like an area in need or something?

10 A. I guess something like that, yeah.

11 Q. In need of redevelopment?

12 A. Yeah.

13 Q. So was there a time NRIA had difficulty  
14 refinancing with low interest rate permanent  
15 financing on facilities?

16 A. I wouldn't know that at the time.

17 Q. You wouldn't know that at the time?

18 A. No.

19 Q. I thought you said you were the guy who  
20 went to try to get permanent loans to take out  
21 the construction financing?

22 A. That was for individual investors, not  
23 NRIA.

24 Q. So if an individual investor said, hey,  
25 I want my money back or I want to make a

1 withdrawal from the --

2 A. No, the way that worked was they would  
3 take a project, subdivide the project let's say  
4 into 10 lots, then sell off each lot to  
5 individual investors. They would assist the  
6 investor and then getting a construction loan to  
7 buy -- to build let's say the project. Then you  
8 have a construction loan. I would have come in  
9 at the time and then refinanced the construction  
10 loan to bring in permanent financing to a 30 or  
11 15 year mortgage.

12 Q. So when the investor put up its money  
13 did it actually get title to one of those  
14 individuals lots?

15 A. Yes.

16 Q. And then did NRIA through its U.S.  
17 Construction then construct a building on the  
18 property?

19 A. Correct.

20 Q. How was U.S. Construction funded?

21 A. I have no idea.

22 Q. Were you ever asked to move money from  
23 NRIA into U.S. Construction?

24 A. No.

25 Q. Can you go to page 2 of 3 of that



1 document. If you go to that page it says, what  
2 makes NRIA unique. Do you see that?

3 A. Yeah.

4 Q. It says, second is NRIA's one hundred  
5 percent successful track record. Since 2010 NRIA  
6 has acquired and developed or is in the process  
7 of developing more than 1,100 luxury residential  
8 units across more than a hundred projects  
9 totaling over 2.3 million square feet valued in  
10 excess of \$1 billion all successfully completed.  
11 Is that true?

12 A. Part of it is true.

13 Q. Which part is not true?

14 A. It wasn't a hundred projects roughly.  
15 During the time I think it was like 18 projects.

16 Q. Why did you say a hundred?

17 A. I don't remember.

18 Q. You knew at the time it wasn't a  
19 hundred, that it was 18?

20 A. I don't remember doing the article so I  
21 don't remember.

22 Q. But you're sure that that part's false?

23 A. That one I know is not right.

24 Q. How about 2.3 million square feet?

25 A. Possibly. I don't know the statistics.

1 Q. In 18 projects?

2 A. 18 projects we had it valued at 1.2  
3 billion from the analysts.

4 Q. Who were the analysts?

5 A. We hired analysts, individual analysts.

6 Q. Who were they, a company I assume,  
7 right?

8 A. No. We had our own individual analysts.  
9 We had Raaj Patel and two other individuals.

10 Q. What did Raaj Patel do?

11 A. He was an analyst. He looked at  
12 numbers, construction numbers, looking at  
13 covering rentals and stuff like that.

14 Q. Who did he answer to?

15 A. Nick.

16 Q. Not to you?

17 A. No.

18 Q. Did you see this before it was  
19 published?

20 A. I probably did, yes.

21 Q. Why didn't you correct that? I mean  
22 that's 10 times bigger than what you -- or five  
23 times bigger than what you had.

24 A. That's true. I don't know. I don't  
25 have the answer.

1 Q. It says third, NRIA's excellent  
2 relationship with the lenders allow us to finance  
3 a majority of projects with low cost debt. Was  
4 there a time that that didn't become true?

5 A. I can't answer that.

6 Q. Was there a time when you had difficulty  
7 getting investor money back to them with bank  
8 loans, permanent bank loans?

9 A. No. I wouldn't say they ever had an  
10 issue with that. The ACH payments were paid back  
11 every month. That's what we were paying the  
12 investors back a monthly stipend on their  
13 investment.

14 Q. When you say stipend was there an  
15 interest component or was it just a return of  
16 principal?

17 A. No. It was a return of principal,  
18 excuse me.

19 Q. So you were returning principal?

20 A. Yes.

21 Q. Why were you doing that?

22 A. That's the format they set up at the  
23 time. That was between Nick and Coley, Coley  
24 O'Brien.

25 Q. So how did you determine how much a

1 stipend would be for any particular investment?

2 A. It was in their contracts.

3 Q. Were you ever a signatory on any of  
4 those contracts?

5 A. No.

6 Q. Who signed those contracts for the  
7 company?

8 A. Rey.

9 Q. Rey signed them all?

10 A. Um-hum.

11 Q. Then it says, more than 950 investors  
12 have participated in NRIA's fund since its  
13 inception and all have received full returns of  
14 principal investment and targeted returns. True?

15 A. They received their -- they received,  
16 some of them received principal returns if  
17 requested. Some of them were rolled over in  
18 other projects.

19 Q. So they didn't all get full returns?

20 A. Correct. Correct.

21 Q. Some of that money got rolled over in  
22 other projects?

23 A. Correct.

24 Q. Was that because you didn't have the  
25 ability to pay them?

1 A. No. It's just what they chose.

2 Q. But you had to meet their investment  
3 money to roll over. When you I say you I mean  
4 NRIA.

5 A. Yes.

6 Q. NRIA needed that money to keep coming  
7 in, right?

8 A. Correct.

9 Q. So that rollover helped NRIA?

10 A. Correct.

11 Q. This is number 11. Can you tell me what  
12 this document is?

13 A. It looks like my website.

14 Q. What is X-On Consulting?

15 A. Yes, my company.

16 Q. X dash on, you pronounce the dash part?

17 A. X-On Consulting I call it.

18 Q. Is this a company you're running now?

19 A. Yes.

20 Q. How long has X-On Consulting consultants  
21 been operating?

22 A. The X-On Consulting was probably -- I  
23 filed that I think about a year and a half ago,  
24 year and a quarter ago roughly.

25 Q. A year and a quarter?

1 A. Yeah, about a year roughly here or  
2 there, give or take.

3 Q. So what does X-On Consulting actually  
4 do?

5 A. I do business consulting. Like I said,  
6 I was working with another company called Prime  
7 Equity. They were looking to develop their --  
8 one of their projects, have fund money come in to  
9 develop it. I gave them some ideas to do it.  
10 It's basically a consulting company.

11 Q. How do you get paid?

12 A. I negotiate a fee. We negotiate it and  
13 have a contract.

14 Q. A fixed fee?

15 A. Yes.

16 Q. I think I asked you what your salary was  
17 at the NRIA and I think you said initially it was  
18 110. Did it go up when you became the COO?

19 A. Yeah. When I left there I was making  
20 about 350.

21 Q. How about bonuses?

22 A. Occasionally, yeah. I don't know the  
23 number.

24 Q. So if we saw your tax return we'd know  
25 what you made?

1 A. Yes.

2 Q. You filed a tax return in each of those  
3 years?

4 A. Yes.

5 Q. When you said bonuses were they like the  
6 bonuses you talked about when you were making  
7 110,000, a thousand here and --

8 A. Yeah, it wasn't much. I mean I'm not  
9 making 10,000, 20,000.

10 Q. But you were making 350,000?

11 A. Yeah.

12 Q. Would it be fair to say that Tanvi or  
13 Renascent, her company, were running a lot of  
14 high volume ads for NRIA?

15 A. Yeah. I would say so.

16 Q. They weren't as targeted as they were as  
17 regards to particular times that they were airing  
18 and things like that, right?

19 A. I don't know off the top of my head.

20 Q. Do you remember there was a discussion  
21 between Katey and Nick and Rey about the fact  
22 that Tanvi was running, running a lot of ads but  
23 they weren't in great time slots and they weren't  
24 getting the kind of responses that they were  
25 expecting for Tanvi?

1           A. I believe that conversation I heard  
2 about it.

3           Q. Do you remember Javier looking at  
4 Tanvi's quotes for time and coming back and  
5 saying that he thought that the spots were not  
6 being effective in generating leads for the  
7 company?

8           A. I believe that's third party from Nick  
9 at the time, yes.

10          Q. So back to that document we just stuck  
11 in front of you that says X-On. What's the motto  
12 that you put up there?

13          A. Business done right.

14          Q. Oh, sounds almost like real estate done  
15 right, doesn't it?

16          A. Yeah, I know.

17          Q. But you're sure you didn't come up with  
18 that slogan, right?

19          A. No. I borrowed it.

20          Q. This is number 14. Have you ever seen  
21 this email chain before, Glenn?

22          A. Probably. I don't have a full  
23 recollection.

24          Q. Do you see there in the middle I still  
25 like the tag lie -- it's supposed to be a line



1 I think but it says lie, like the false  
2 statement -- real estate investing done right.  
3 That's the first time I see that in a document  
4 and it came from you and you're sure that came  
5 from Rey?

6 A. Yeah.

7 Q. Do you see below that there's an email  
8 from Javier that's written to a number of people  
9 including you and he's telling you the things  
10 that have to be on the billboard, right?

11 A. Um-hum.

12 Q. He wasn't suggesting content, was he?

13 A. I don't know.

14 Q. Was he saying you should say you'll get  
15 12 percent, you could say this, you could say  
16 that?

17 A. Most of the content always came from  
18 Nick.

19 Q. So you don't know of anything?

20 A. No.

21 Q. If you go to the third page of that  
22 document there's an email from Claudio Burgos.  
23 Do you know who that is?

24 A. Yes.

25 Q. Who is that?

1 A. One of the partners from H&L Media.

2 Q. That's one of the entities you mentioned  
3 here when you were talking to me about people  
4 you'd bid?

5 A. Yes.

6 Q. He says, here's the markup with the  
7 shading but we balance the size and position and  
8 you said I don't like the look.

9 A. Okay.

10 Q. So you were approving that ad, right?

11 A. I believe so, yeah.

12 Q. Did Katey Kana work for you?

13 A. No. She worked for NRIA.

14 Q. Was she one of the department heads?

15 A. Yes.

16 Q. So she answered to you, right, you said  
17 initially that you --

18 A. Yes.

19 Q. Here she's suggesting on page 3 please  
20 make the following edits on the realty investing  
21 done right. Do you see that?

22 A. Okay.

23 Q. I assume you approved those?

24 A. Going back not remembering, probably.

25 Q. This will be La Mattina 16. Can you go

1 to the top of that document.

2 A. Okay.

3 Q. It appears to be an email from you,  
4 Glenn La Mattina, to Nicholas Salzano, Tanvi and  
5 Javier and Kyle Stafirny, right?

6 A. Um-hum.

7 Q. And there's a quote underneath there.  
8 Read that if you could into the record.

9 A. NRIA delivering superior returns and  
10 steady cash flow to all investors at this time.

11 Q. So those were your revisions to that  
12 language, right?

13 A. I believe so.

14 Q. And you bolded the things that you  
15 added?

16 A. I can't say that for sure because I  
17 don't remember.

18 Q. If you look below it says, okay, let's  
19 say NRIA helping with superior returns and cash  
20 flows and above you said NRIA delivering superior  
21 returns and steady cash flows.

22 A. Probably.

23 Q. You don't have any reason to dispute  
24 that that's your writing, right?

25 A. I have no reason to dispute it, no.

1 Q. This is 17. Have you ever seen this  
2 email before?

3 A. No.

4 Q. Do you see here that Javier is telling  
5 her that she's delivering 407 spots and that with  
6 his proposal he will deliver more than 800 live  
7 game spots?

8 A. What part?

9 Q. Next to the last paragraph.

10 A. Okay.

11 Q. Can you go to the next to last page of  
12 that document or maybe the third from the last  
13 page. It starts with an email from Javier dated  
14 August 12, 2020. Have you ever seen that?

15 A. Where are you? August 10th?

16 Q. I'm sorry, Glenn, I gave you the wrong  
17 page numbers. It's the third page in.

18 A. Okay.

19 Q. Were you aware at this time that Tanvi  
20 was charging twice as much for these live game  
21 shows that Javier was?

22 A. No.

23 Q. At the bottom of this there's an email  
24 to Javier, right, and it says, sorry to drag you  
25 into this but please give me a detailed answer

1 below. I have to answer accurately since I  
2 reduced her a lot and she's a known liar. Do you  
3 see that?

4 A. Um-hum.

5 Q. He's talking about Tanvi, right?

6 A. Yes.

7 Q. Did he ever tell you he thought she was  
8 a liar?

9 A. No. Javier never said that to me.

10 Q. No, no, I'm talking about Nick. It's  
11 from Nick that email. See it?

12 A. Um-hum. Yes.

13 Q. You didn't know that Nick thought she  
14 was a liar?

15 A. I know Nick didn't like some of the  
16 dealings from the advertising.

17 Q. What was wrong with some of the  
18 dealings? He thought she was self-dealing,  
19 right?

20 A. He thought she was charging for spots  
21 not delivered.

22 Q. That was in fact true, wasn't it?

23 A. From my understanding, from what I  
24 heard, yes.

25 Q. It got her fired, didn't it?

1 A. No.

2 Q. Who fired her from NRIA?

3 A. You mean the contract side? She  
4 actually became an employee at NRIA at the very  
5 end.

6 Q. That's what I'm talking about, was she  
7 an employee at the very end?

8 A. At the very end, yeah.

9 Q. This is 18.

10 A. Okay.

11 Q. Did you ever see this letter?

12 A. I believe, yeah, Nick ordered it done.

13 Q. And he ordered you to send it out,  
14 right?

15 A. I believe so, yes.

16 Q. You were somewhat resistant to the  
17 notion of that, weren't you?

18 A. Yeah. I didn't realize the full extent  
19 of what was going on with Tanvi and Nick.

20 Q. Were you the person who looked at her  
21 bills?

22 A. Reviewed them, yeah. Then I gave them  
23 to Nick.

24 Q. This is number 38. Does that look like  
25 one of Renascent Enterprises' bills?

1 A. Correct, yes.

2 Q. You authorized the payment of these?

3 A. I reviewed them and then sent them to  
4 Nick.

5 Q. Tell me how many ads ran between August  
6 31st and September 6, the number?

7 A. I have no idea.

8 Q. How many ads ran on Fun Asia Radio, how  
9 many times did they run it?

10 A. I don't know.

11 Q. So how do you know that she ran them at  
12 all?

13 A. I don't have full confirmation that she  
14 did.

15 Q. Did you ever see a bill for Tanvi where  
16 she detailed the amount of times the spots ran?

17 A. I don't say a hundred percent. I  
18 believe she did send that over to Nick to review  
19 to show.

20 Q. I'm talking about an invoice?

21 A. No.

22 Q. You never saw an invoice from her that  
23 actually detailed the amount of times the spots  
24 ran, right?

25 A. No, not that I've seen, no. These were

1 usually the bills and she gave me copies.

2 Q. Do you know what kind of margin she was  
3 making on these sales? It could have been a  
4 hundred percent, right?

5 A. Could have been. In discussion, though,  
6 she was saying she did anywhere between 10 to 15  
7 percent. And then I could tell you at the end  
8 Nick told her to get raw pricing and add her  
9 profit on top separately.

10 Q. You didn't have any problems paying  
11 them, though, even though there was an absence of  
12 any detail for how many spots ran, right?

13 A. No. Whatever was given to Nick. Nick  
14 reviewed it. He paid it.

15 Q. Were you able to determine the margins  
16 that any of these other companies were charging?

17 A. I know between H&L about the same,  
18 between 10 to 15 percent.

19 Q. How were you able to determine that?

20 A. This is what they told me. This is what  
21 it was charging me to buy, let's say, the  
22 billboard ads. We're adding our profit on top.

23 Q. 19 percent you said?

24 A. No. I said between 10 to 15.

25 Q. And that would be right on the invoice?



1           A. That's -- I believe so, yes. I haven't  
2    seen their invoices in a long time.

3           Q. Was there a particular place where you  
4    retained the competitive bids other than  
5    electronically, did you keep any paper copies of  
6    any of that stuff?

7           A. No. It was all electronic.

8           Q. Was there a particular space inside of  
9    your email box like a box within your in-box?

10          A. Like a folder?

11          Q. Yeah.

12          A. Probably.

13          Q. Do you know what kind of office software  
14    NRIA used, did they use Microsoft Outlook?

15          A. Yeah.

16          Q. How did you know Rey Grabato?

17          A. I met him when I met Nick.

18          Q. So you didn't know him before you met  
19    Nick?

20          A. No.

21          Q. Was he also a mortgage broker?

22          A. I believe so, yes.

23          Q. You didn't know him from those circles?

24          A. No.

25          Q. Did NRIA have any commercial property it

1 was developing?

2 A. When you say commercial, what do you  
3 mean?

4 Q. You know a shopping center, a mall?

5 A. No.

6 Q. Office building?

7 A. We had apartments with retail. That was  
8 pretty much our mixture of the two.

9 Q. So they were essentially residential but  
10 maybe there might be a first floor retail  
11 component?

12 A. Yeah.

13 Q. Who is Patryk Golaszewski?

14 A. He was one of the employees at NRIA.

15 Q. What was his job?

16 A. I'll call him the gopher for Nick.

17 Q. Gopher, g-o-p-h-e-r?

18 A. Yeah.

19 Q. Like the rodent?

20 A. Yeah.

21 Q. I think a gopher is a rodent but I'm not  
22 sure.

23 A. I guess.

24 Q. When you say he was a gopher did he have  
25 any skills, like --

1 A. No. He was a young college kid.

2 Q. Were you aware that Nick was trying to  
3 get Javier to actually find out what Tanvi was  
4 paying for the advertisement separate from the  
5 agency fee?

6 A. No.

7 Q. Did you know that Nick had concerns that  
8 Tanvi was overcharging for the advertising time?

9 A. He brought it to my attention.

10 Q. Did you ever discuss with Tanvi the  
11 cease and desist letter?

12 A. I asked her what that was about and she  
13 mentioned to me that she was still trying to get  
14 better pricing on different things on behalf of  
15 NRIA. I told her to stop. Nick wanted her to  
16 stop.

17 Q. So she was no longer an employee of NRIA  
18 at that point?

19 A. She wasn't. She was still contracted.  
20 She was a contracted vendor.

21 Q. So she was out and representing to third  
22 parties she had some authority within NRIA,  
23 right?

24 A. Correct.

25 Q. And she didn't have that authority, did

1 she?

2 A. Not when she got her cease and desist,  
3 no.

4 Q. Who is Tom Marsillo?

5 A. Who?

6 Q. Tom Marsillo, do you know him?

7 A. No.

8 Q. This is La Mattina 20. Did you ever see  
9 this email from Javier to Nick and to Pat and to  
10 Katey Kana?

11 A. No.

12 Q. In it he's saying she's charging \$142  
13 for a 30 second spot and that his price is \$71,  
14 right?

15 A. Um-hum.

16 Q. Yes?

17 A. Yes, sorry.

18 Q. This is going to be La Mattina 21.  
19 Glenn, do you see you're listed on here on these  
20 email chains?

21 A. I see that.

22 Q. You see this email from Patryk  
23 Golaszewski. He says, team, javier has a better  
24 A&D cost. Like he said he is trying to get them  
25 to place more spots in the six to 10 time frame.

1 I think we should stick with just pushing more  
2 spots -- I think we should stick with just  
3 pushing more spots here because it is a  
4 conservative talk show. There's a typo in it and  
5 I read the typo. He said, like he said he is  
6 trying to get them to place more spots at  
7 six a.m. to 10 a.m. time frame. I think we  
8 should stick with just pushing more spots her  
9 since it is conservative talk show. I do not  
10 think we should increase frequency and spend more  
11 on this situation yet until we see if the  
12 conservative talk delivers. Do you see that?

13 A. Um-hum.

14 Q. In response to Pat telling Nick that  
15 Javier has the better rates he says Jav, proceed,  
16 right?

17 A. Yes.

18 Q. Did you at that time have any  
19 reservation about Javier proceeding with that  
20 program?

21 A. I didn't even go to Nick with anything.  
22 I let Nick handle it.

23 Q. No, but you were copied on it?

24 A. I was copied on it, but I didn't --

25 Q. But you didn't say to Nick this is a bad

1 idea?

2 A. No. Nick runs the show pretty much.

3 Q. Understood. This is La Mattina 23.

4 Have you ever seen this email before?

5 A. No. Just now.

6 Q. Are you aware of any contractual

7 provisions between NRIA and either Media

8 Effective and/or Javier, have you ever seen any

9 contracts?

10 A. No.

11 Q. La Mattina 24. Have you ever seen this

12 email?

13 A. No.

14 Q. This is from Katey Kana to Javier,

15 Patryk and Nick. And he says, the previous buy

16 under Tanvi was 24,000 and 60 and Javier

17 negotiated it to 21,275. Do you see that?

18 A. Um-hum.

19 Q. Here's an instance where Javier again

20 beat Tanvi's quotes, right?

21 A. Yes.

22 Q. Were you responsible for any of the

23 filming of the TV spots?

24 A. No.

25 Q. Who did those?

1 A. When you say who?

2 Q. Who arranged for those to be done?

3 A. Probably Katey Kana and maybe Kyle

4 Stafirny.

5 Q. How about before Katey came, she wasn't  
6 there the whole time, right?

7 A. No.

8 Q. Who was doing them before Katey, do you  
9 know?

10 A. No idea. I think Nick had somebody in  
11 Philly.

12 Q. That was actually filming them?

13 A. Yeah.

14 Q. Setting them up to film?

15 A. Um-hum.

16 Q. Were you ever in any of the spots?

17 A. No.

18 Q. You never acted as talent?

19 A. Nope. Behind the scenes.

20 MS. LASLEY: With a face like that?

21 THE WITNESS: I could take that two  
22 ways.

23 (Off the record)

24 BY MR. GEORGE:

25 Q. This is La Mattina 25. This looks like

1 an email from Nick and you're copied on it. And  
2 I think what they're sending is the cease and  
3 desist letter. And if you look at the bottom  
4 you'll see that the lawyer that you were dealing  
5 with Kristin Grant is listed there?

6 A. Um-hum, yeah.

7 Q. Was this the email you received the  
8 cease and desist letter in connection with?

9 A. I believe so.

10 Q. When you saw the letter did you go to  
11 Nick and say what's this about or did you know  
12 about it in advance?

13 A. I probably knew about it in advance. He  
14 probably told me.

15 Q. This is La Mattina 26. Have you seen  
16 this email before?

17 A. No.

18 Q. Did you know that Nick was asking Javier  
19 to quote all of the work that Tanvi was actually  
20 providing, all the media and advertising?

21 A. I can't say a hundred percent that I  
22 did.

23 Q. Did you later find out as this thing  
24 indicates that he asked Javier to quote the whole  
25 shebang?



1 A. I can't remember.

2 Q. This is La Mattina 27. Did you ever see  
3 that email before?

4 A. No.

5 Q. So would you agree that prior to 2021  
6 that Javier was not the sole buyer for I guess  
7 SEA means Southeast Asia advertising time?

8 A. Correct.

9 Q. So only after 2021 -- and in particular  
10 September of 2020 this email is written I don't  
11 know whether that's the date or not but effective  
12 2021 -- Javier was the sole supplier of the  
13 Southeast Asia time, right?

14 A. Correct.

15 Q. And prior to that time was it Renascent  
16 and Tanvi?

17 A. And Tanvi, yes. I think there was  
18 another small sales agent company. I forget the  
19 name.

20 Q. Does Tanvi live in the U.S.?

21 A. Yes.

22 Q. Where does she live?

23 A. Edison I think.

24 Q. Near the Ford plant?

25 A. I have no idea.

1 Q. That's the only thing I know about  
2 Edison. So while you were working with Tanvi did  
3 you develop a close relationship?

4 A. We have a friendship, yes.

5 Q. Did you ever socialize with her when you  
6 were in India, go out to dinner with her?

7 A. Yeah. We had some drinks.

8 Q. Had some drinks and dinner?

9 A. Yes.

10 Q. Is she a married person?

11 A. Yes.

12 Q. Did you meet her husband?

13 A. On one of the events, yes.

14 Q. Were you aware that Nick was asking  
15 Javier to investigate whether Tanvi was stealing  
16 from the company?

17 A. No.

18 Q. This is La Mattina 28. Do you see here  
19 where Nick is telling Javier we'd like to go  
20 directly to these stations and get a better deal  
21 but at least confirm that we are not getting  
22 ripped off?

23 A. Correct.

24 Q. Nobody at NRIA knew what she was paying  
25 for the time, right?

1 A. No.

2 Q. And none of the bills had any invoices  
3 to show when she was running the time, right?

4 A. As far as I'm aware, correct.

5 Q. Did you and Tanvi ever overlap as  
6 employees at NRIA?

7 A. What do you mean?

8 Q. Well, were you ever there at the same  
9 time as employees?

10 A. At the very end, yeah.

11 Q. And was she selling media time at that  
12 time?

13 A. I believe so.

14 Q. And making a commission?

15 A. I guess. I didn't control anything. It  
16 wasn't my wheelhouse.

17 Q. But as the COO did you see any potential  
18 conflicts of interest in her being both an  
19 employee of the company and at the same time  
20 making sales?

21 A. She was being hired as an employee to  
22 work with the salespeople. That was her new  
23 position when she was hired.

24 Q. When you say the salespeople?

25 A. The marketing people, the agents to help

1 bring in investor money.

2 Q. Are you talking about the closers?

3 A. Closer, if you want to call it that.

4 Q. She became a closer?

5 A. Yeah.

6 Q. But she was still selling ad time to the  
7 company, right?

8 A. I don't know at the time to be honest  
9 with you.

10 Q. Did you ever see any of the scripts that  
11 were read to investors?

12 A. I read the scripts, yes.

13 Q. Did they say anything about 12 percent  
14 in them?

15 A. Yes.

16 Q. When did that stop being included in the  
17 investor package?

18 A. I believe when Brian Casey suggested  
19 that change, the verbiage.

20 Q. To verbiage?

21 A. Change the verbiage.

22 Q. The verbiage?

23 A. Change the verbiage, yes.

24 Q. Is that because at that time you weren't  
25 generating 12 percent returns?

1           A. We were paying our ACH payments monthly.  
2   We felt you couldn't guarantee 12 percent. We  
3   felt it should be changed.

4           Q. So now when you felt that way did you go  
5   back to the original people that you solicited  
6   with the 12 percent guarantee number and tell  
7   them that?

8           A. I didn't solicit anybody for any  
9   investment.

10          Q. When NRIA solicited those people did you  
11   as the chief operating officer suggest that you  
12   go back to those original investors and say, hey,  
13   we're not giving 12 percent anymore and we can't  
14   guarantee it?

15          A. No.

16          Q. Number 30. Did you ever see this email  
17   before?

18          A. No.

19          Q. Do you know what an insertion order is?

20          A. No.

21          Q. I asked you earlier if you knew Tom  
22   Marsillo from Emerging --

23          A. Correct.

24          Q. You didn't know him?

25          A. No.

1 THE VIDEOGRAPHER: We're going off  
2 record. The time is 12:32 p.m.

3 (Off the record)

4 THE VIDEOGRAPHER: We're back on the  
5 record. The time is 12:33 p.m.

6 BY MR. GEORGE:

7 Q. You should have 31.

8 A. Okay.

9 Q. Did you redo a letter appointing him as  
10 the South --

11 A. I believe I did, yes.

12 Q. And this didn't come from Nick, though,  
13 this came from Rey?

14 A. Correct.

15 Q. And that was the guy you considered that  
16 you worked for, right?

17 A. He was the CEO.

18 Q. Did she then make proposals for  
19 newsreels, construction and video of the  
20 construction and sales of the properties, did she  
21 start doing that, do you know?

22 A. I don't remember if she got any  
23 involvement on that.

24 Q. What's the date of that email?

25 A. October 11, 2021.

1 Q. La Mattina 32. Glenn, the first email  
2 is Monday, October 11th and by the 14th he's  
3 writing you again and saying -- why did it take  
4 you so long to do that?

5 A. I don't know.

6 Q. Do you have a personality conflict with  
7 Javier?

8 A. No. I like Javier. I think he's a nice  
9 guy.

10 Q. La Mattina 33. Have you ever seen this  
11 email before, Mr. La Mattina?

12 A. No.

13 Q. Were you aware that as of July 2021 she  
14 was maintaining she was the VP of global  
15 marketing for NRIA?

16 A. No.

17 Q. Was she the VP of global marketing at  
18 NRIA at any point?

19 A. No.

20 Q. What was her actual position, do you  
21 know, when she was hired?

22 A. Once she was hired as an employee she  
23 was a project manager.

24 Q. Not a VP of anything, right?

25 A. No.

1 Q. She may have overstated her case a  
2 little bit there, right?

3 A. Um-hum.

4 Q. Why was she doing that, do you know?  
5 Why was she holding herself out as a --

6 A. I think she was trying to solidify her  
7 position or she was trying to gain access to the  
8 market so she could sell advertising.

9 Q. Why would she have to be related to NRIA  
10 to do that?

11 A. I think she was still trying to get  
12 business from NRIA and Nick.

13 Q. If she would have reached out just as an  
14 individual she wouldn't have been able to get  
15 those kind of contacts?

16 A. I don't know.

17 Q. So your suggestion is she was trying to  
18 keep an oar in the water for future opportunities  
19 with NRIA?

20 A. I guess so, yes.

21 Q. Did Nick tell you that people at  
22 Emerging Markets were complaining that Tanvi was  
23 causing confusion and making mayhem for them?

24 A. Not in so many words. Just, you know --

25 Q. Making it difficult?



1 A. Yeah. Yeah.

2 Q. How much was Tanvi paid a year?

3 A. I have no idea.

4 Q. You didn't hire her?

5 A. Art hired her.

6 Q. Who?

7 A. Art Scutaro, senior VP of sales,  
8 marketing, whatever you want to call it, project  
9 management.

10 Q. Was Scutaro selling investments?

11 A. Yes.

12 Q. Was he the guy who oversaw the closers?

13 A. Yes.

14 Q. Did he write scripts for the closers?

15 A. Not that I'm aware.

16 Q. Who wrote the scripts for the closers?

17 A. Usually Nick and then an advertising  
18 firm down in Philadelphia.

19 Q. Was there a room where the closers sat?

20 A. Just an open space, open bullpen.

21 Q. Cubicles?

22 A. Yeah.

23 Q. Were they all in the same area?

24 A. Yes.

25 Q. Were any particular people committed to

1 the Southeast Asian market?

2 A. No. Wait. What's his name, Raaj, one  
3 of project managers from India.

4 Q. He would marshal the contacts in from  
5 Southeast Asia?

6 A. As much as he could, yeah.

7 Q. And then the closers, were any of these  
8 people -- they were all English speaking I  
9 assume?

10 A. Yes.

11 Q. So they would call in and then Raaj  
12 would --

13 A. It was on a rotating basis. Everybody  
14 got a call. If it was a South Asian person they  
15 would try to direct it toward Kulraaj.

16 Q. Then did Kulraaj do the actual closing  
17 or did he oversee the closing?

18 A. Art and A.J. all work with the closers  
19 together. It was a joint effort.

20 Q. While you were at the company was the  
21 company ever sued for any business debt?

22 A. Not that I'm aware of.

23 Q. Did you ever see any letters from  
24 creditors that bills weren't being paid?

25 A. Not that I was aware of, no.

1 Q. Did Tanvi ever express to you she was  
2 upset that Javier took her business?

3 A. She mentioned it, yes.

4 Q. Did that concern you in any way, she was  
5 a friend, a social friend?

6 A. She was a friend. I said talk to Nick.  
7 Nick ran the show and nothing got done without  
8 his say so.

9 Q. Did you make any commissions on sales  
10 through the EB program?

11 A. No.

12 Q. Did you make any commissions on any  
13 sales anywhere?

14 A. No.

15 Q. Strictly salaried?

16 A. Strictly fee or salary.

17 Q. This is 29.

18 MS. LASLEY: Do you know, if there's a  
19 reason why the bottom portion of that email is  
20 not there?

21 MR. GEORGE: Yes. You mean the rest of  
22 the chain?

23 MS. LASLEY: Also it says on Wednesday,  
24 October 9, 2019 Thomas Marsillo wrote and then  
25 there's nothing that he wrote.

1 MR. GEORGE: I don't, but I'll look and  
2 see. Aneca, let me make a note. I'll check on  
3 that and let you know right away.

4 MS. LASLEY: Okay.

5 BY MR. GEORGE:

6 Q. Do you have that document, sir, in front  
7 of you, 29?

8 A. Yes.

9 Q. This is again Tom Marsillo saying, we  
10 had no idea she was an NRIA employee. In October  
11 9 of 2019 was she an employee of NRIA?

12 A. No.

13 MR. GEORGE: This seems like a good time  
14 to break.

15 THE VIDEOGRAPHER: We are going off  
16 record. The time is 12:47 p.m.

17 (Lunch recess)

18 THE VIDEOGRAPHER: We're back on the  
19 record. The time is 1:17 p.m.

20 BY MR. GEORGE:

21 Q. Tanvi was doing the same kind of thing  
22 with other networks that might have dealt with  
23 Southeast Asia like Z TV?

24 A. I think she was part of the Z network  
25 there.

1 Q. What is that, the Z network?

2 A. It's like ABC, CBS.

3 Q. But it's in Southeast Asia?

4 A. I believe so. I'm not really familiar  
5 with the network.

6 Q. This is 35. Have you ever seen this  
7 email chain?

8 A. Obviously, yes. I'm CC'd on it, I guess  
9 or part of it.

10 Q. Do you recall what going on at this  
11 time?

12 A. I believe there was two letters of  
13 agency floating around. Tanvi was given one and  
14 I guess Javier got the new one, updated one.

15 Q. Did Nick also try to shut that down,  
16 prevent her from doing that?

17 A. I guess, yes.

18 Q. He viewed it at unauthorized?

19 A. Yes.

20 Q. La Mattina 36. So this is an email from  
21 Katey Kana to Javier Torres, right?

22 A. Yes.

23 Q. And she says, please see below. Will  
24 that suffice to move over to you 100 percent.  
25 Please advise. There's an email below it that

1 says, noted and will do. We will cancel for  
2 December only, only in capital letters, and then  
3 transition to Javier. Let me see if we can  
4 cancel sooner or if December and transitioning to  
5 Javier will work. We'll handle and circle back  
6 with an update. Do you see that?

7 A. Um-hum.

8 Q. This is Katey Kana directing that the  
9 business go back to Javier, right?

10 A. Correct.

11 Q. She was the head of marketing?

12 A. Yes.

13 Q. Do you have any reason to believe she  
14 wasn't consulting with Nick and your friend Rey?

15 A. Rey, no.

16 Q. Do you know what Nick means in this last  
17 email that he wrote. In fairness you're not  
18 copied on it so if you don't know it's fine. But  
19 he says in here, let's move to implement this  
20 immediately. Take one month off only. Cancel  
21 all South Asia India media. That will take two  
22 weeks' notice likely with Tanvi. Do you know  
23 what that means?

24 A. I think he was canceling her contracts  
25 and Javier was talking over from what it sounds

1 like.

2 Q. Was there some kind of two-week notice  
3 provision or something?

4 A. Not that I'm aware.

5 Q. Have you ever seen Tanvi's or  
6 Renascent's agreements?

7 A. No.

8 Q. Do you have any idea what the terms  
9 were?

10 A. No.

11 Q. You see on the last page Javier is  
12 talking about partnering with someone else down  
13 in the Southeast Asian market to get better rates  
14 for NRIA?

15 A. I remember that in conversation probably  
16 a couple years back when they were discussing it,  
17 yeah.

18 Q. Do you recall ever voicing an objection  
19 to Javier being the agent of record for NRIA in  
20 Southeast Asia?

21 A. No.

22 Q. La Mattina 37. Did you ever see this  
23 email where Katey Kana wrote to Javier and said,  
24 Javier, we don't have any contracts with anyone  
25 so please get the proposal. The direction is

1 from Nicholas to get two proposals minimum before  
2 any buy. Do you see that?

3 A. Yes, I saw it. But no, I have no  
4 knowledge of any of that.

5 Q. Do you know that Javier was getting  
6 proposals from multiple sources?

7 A. Maybe in a sidebar with Katey but no,  
8 nothing direct.

9 Q. If you look at the second page of that,  
10 Mr. La Mattina, the top of it.

11 A. Hold on.

12 Q. Did you see -- go ahead.

13 A. Yeah.

14 Q. Were you aware that Javier was trying to  
15 get business with Sony TV and that Renascent and  
16 the Tanvi were holding themselves out as contract  
17 parties for NRIA?

18 A. Not directly, no.

19 Q. Did you hear about that indirectly?

20 A. In the conversations probably around the  
21 office.

22 MR. GEORGE: Could we go off the record?

23 THE VIDEOGRAPHER: We're going off  
24 record. The time is 1:26 p.m.

25 (Off the record)



1 THE VIDEOGRAPHER: Back on the record,  
2 1:27.

3 MR. GEORGE: I think make these 39 or  
4 make them another -- let's mark them as 39. And  
5 let me show them to you first before we mark  
6 them. It's the only ones unfortunately that I  
7 have.

8 THE VIDEOGRAPHER: We're going off the  
9 record. The time is 1:28 p.m.

10 (Off the record)

11 MR. GEORGE: I'm withdrawing 39.

12 THE VIDEOGRAPHER: We're back on the  
13 record. The time is 1:30 p.m.

14 BY MR. GEORGE:

15 Q. Mr. La Mattina, did you as COO monitor  
16 cash flows --

17 A. No.

18 Q. -- coming into the company?

19 A. No.

20 Q. Who would have been the person that  
21 would have been doing that?

22 A. That would have been the accountant  
23 which was Bob or the comptroller during the time  
24 which was Bob and his last name is, Rey's cousin.  
25 I'm trying to get his name for you. I don't have

1 his full name for you.

2 Q. That's fine. Mr. La Mattina, early on  
3 right at the beginning of your deposition you  
4 said that you were the bank relationship person  
5 in the sense not of -- not in the sense that you  
6 were dealing with the day-to-day deposits that  
7 happened but in the refinancing of these  
8 obligations that were created by NRIA to build  
9 the buildings, right?

10 A. Well, I was refinancing individual  
11 investor projects, not anything for NRIA.

12 Q. So when you did that how did you get the  
13 financial information to provide to the banks on  
14 the refinance?

15 A. I asked the clients for their updated  
16 pay stubs, tax returns, bank statements, so forth  
17 and so on.

18 Q. So the loans were being obtained in the  
19 names of the investors?

20 A. Correct.

21 Q. Did you make any commissions on those  
22 sales?

23 A. Yes.

24 Q. Were you the broker?

25 A. I was the agent. At the time I was a

1 licensed mortgage originator.

2 Q. What's the difference between that and a  
3 broker?

4 A. If you're a broker that's one  
5 designation of a license. When I had my company  
6 I was a licensed banker non-servicing. That  
7 means I closed in my name and sold off to other  
8 entities.

9 Q. So you didn't have your own line you  
10 were funding them with?

11 A. No. I used -- correct. Then a broker  
12 is somebody that just uses somebody else's money.  
13 They commit in the other person's name. When I  
14 shut my company down I lowered my license  
15 category to an originator. That means I just  
16 worked for a company under their tutelage.

17 Q. When you made those commissions that's  
18 separate from your salary from NRIA, right?

19 A. I wasn't working for NRIA yet. Meaning  
20 I was an independent mortgage originator working  
21 I believe for First Franklin, United Mortgage,  
22 stuff like that.

23 Q. When you became an employee of NRIA then  
24 who did those refinance deals?

25 A. They went to other banks, other

1 concerns.

2 Q. But were you placing them?

3 A. No.

4 Q. Who then was the person at the company  
5 who was refinancing those investor loans?

6 A. Nisha Scharman, Caroline Taylor were two  
7 individuals working under them.

8 Q. Were they bankers, did they have access  
9 to lines or how were they getting --

10 A. They would bring in independent people  
11 like me to work to refinance.

12 Q. And this was while you were an employee  
13 at NRIA?

14 A. While I was an independent vendor or  
15 contractor. Remember I was a 1099 employee and  
16 then --

17 Q. So while you were a 1099 employee of the  
18 company loans were -- investor loans were being  
19 refinanced?

20 A. Correct.

21 Q. You were not the person receiving  
22 commissions on those transactions?

23 A. No.

24 Q. Before you were a 1099 employee you were  
25 doing that for NRIA and at that time you made

1 commissions?

2 A. Correct.

3 Q. Do you know how much you made in  
4 commissions?

5 A. Not off the top of my head.

6 Q. Do you know how much gross in loans you  
7 recast?

8 A. That's going back years -- no, I don't.

9 Q. Could it be 15 or \$20 million?

10 A. I can't even guess at a number.

11 Q. Was it less than \$5?

12 A. Of course it was.

13 Q. Was it more than \$10,000?

14 A. I would say -- it's speculative. I  
15 can't give you a figure. It's been how many  
16 years for me?

17 Q. I don't know.

18 A. 2016, 2017.

19 Q. That was the time period 2016 to 2017?

20 A. Yeah.

21 Q. Did you file a tax return in those  
22 periods too?

23 A. Yes, I did.

24 Q. As interest rates started to go up did  
25 refinancing those investor loans start to become

1 more difficult?

2 A. No. The problem was not the interest  
3 rates but the property values. When you do a  
4 mortgage you have a conforming loan amount and  
5 then you have jumbo loan amounts. My jumbo loan  
6 outlets were very limited. I did not get good  
7 financing rates. So that was one of the reasons  
8 why this move was a good move for me at the time.

9 Q. So you're basically saying loan to value  
10 was the issue?

11 A. No. It was the product, meaning if  
12 jumbo loan rates -- just as an example a jumbo  
13 loan category let's say in the standard market  
14 for as an originator not working for a bank might  
15 be seven. But like small S&Ls have better  
16 products. They can give you 6.5. I didn't have  
17 access to that kind of money.

18 Q. And what's a jumbo, above 417?

19 A. Today it's like 720 at the time.

20 Q. 720 is a jumbo?

21 A. Yeah.

22 Q. Wow.

23 A. Yeah.

24 Q. Was there an average price these units  
25 went or were they all over the page with respect

1 to values?

2 A. There you go. They varied.

3 Q. What states were they located in?

4 A. This was all Pennsylvania.

5 Q. Did you in any way aid in trying to  
6 locate property for redevelopment?

7 A. No.

8 Q. Did you ever inspect any of the  
9 construction going on at the properties?

10 A. I've been at sites, yes.

11 Q. What was the purpose of your visit to  
12 the sites?

13 A. Nick wanted me to see what was going on.  
14 Nick wanted to see what was going on, how the  
15 progression of the project was, if the projects  
16 were built according to specs, stuff like that.

17 Q. How often did you go to the actual  
18 projects?

19 A. It varied. Maybe once a month, maybe if  
20 I had to go to Florida it was six months, eight  
21 months.

22 Q. After 2019 did you ever go to any of  
23 those sites and hear any of the construction  
24 vendors complaining about not being paid?

25 A. Not in 2019.

1 Q. How about in 2020?

2 A. '21, '22 there were some issues.

3 Q. Who was complaining?

4 A. Tony, the construction manager or senior  
5 VP of construction. He was complaining that he  
6 put his invoices in. They don't get paid on  
7 time.

8 Q. And Tony was an employee of NRIA?

9 A. Yes.

10 Q. When you said his invoices?

11 A. When he would review the invoices coming  
12 in from different vendors.

13 Q. Fair enough. So he's saying I got a  
14 group of vendor claims here, they need to be paid  
15 and they're not being paid fast enough?

16 A. Correct.

17 Q. When that happened did you go back and  
18 say to Nick or Rey, hey, what the heck is going  
19 on?

20 A. Yeah. They said they would take care of  
21 it.

22 Q. That was their answer, they'll take care  
23 of it?

24 A. Yeah.

25 Q. You never inquired as the COO how they



1 would take care of it?

2 A. No. Because again Nick ran the company  
3 very tight. It was Nick's way or no way.

4 Q. Could you have made a suggestion to him  
5 or said, hey --

6 A. If they asked me to, yes.

7 Q. You just weren't volunteering?

8 A. Right.

9 Q. Did you feel as the COO you had any duty  
10 to the company to volunteer?

11 A. I had duties but I know with Nick's  
12 mentality of running the company it was his way  
13 or no way.

14 Q. Did that concern you that you couldn't  
15 express what you felt?

16 A. Yeah. When I did say it I got an answer  
17 from Nick and I moved on.

18 Q. Why didn't you quit when that started  
19 happening?

20 A. Because I was still hoping we might be  
21 able to save the company.

22 Q. And that's in '21 you said?

23 A. '21 going into '22.

24 Q. Were you involved in the discussion  
25 about filing bankruptcy?

1 A. Yes.

2 Q. How were you involved?

3 A. Brian Casey, myself, John Collins, Rey,  
4 Tommy Scadero, the CFO, we all sat down and said  
5 what was the best way to do it along with the  
6 attorneys, what needed to be done to try to save  
7 the company.

8 Q. How long prior to the bankruptcy filing  
9 did that first meeting happen, a few months?

10 A. A few months, I guess, yeah.

11 Q. At that time, in that meeting did Nick  
12 and Rey -- were there any lawyers there?

13 A. They were probably on conference calls  
14 with us. Not in person.

15 Q. At that time was all the issues that  
16 were going on at the company discussed with the  
17 lawyers?

18 A. With my access, yes. With my access not  
19 there, I don't know.

20 Q. You mean if you were there and you heard  
21 it?

22 A. Yeah.

23 Q. But you don't know what happened when  
24 you got off the conference call or whatever?

25 A. Yeah.

1 Q. It was not an in-person meeting, it was  
2 a Zoom meeting?

3 A. No. It was in person with the people in  
4 the conference room.

5 Q. Was it at NRIA's location?

6 A. Yes.

7 Q. Who were the lawyers, what firm?

8 A. Sills and Cummis was one of them.

9 Q. Is that who filed for bankruptcy?

10 A. I believe so. Was it Sills and Cummis?  
11 I'm not sure. Off the top of my head I don't  
12 know.

13 Q. I should probably know that myself. Was  
14 Nick pressuring people to get in more investor  
15 money?

16 A. Always. Yeah. Always pushed the ads,  
17 pushed the calls, that kind of thing.

18 Q. Did that concern you when you started to  
19 hear about the financial issues that started in  
20 2019 with the non-payment of vendors and through  
21 '21 when you went to the sites and heard the  
22 construction people complain about payments?

23 A. No one ever complained to me at the  
24 sites, nor anything in 2019. The issues were  
25 probably around 2021 into 2022 when Tony was

1 complaining about the vendors taking their time  
2 to get paid.

3 Q. Is that the time period when Nick was  
4 pressuring people to ramp up the ads and ramp up  
5 the investors?

6 A. He always ramped up everybody. Time  
7 doesn't matter. He always pushed salespeople to  
8 push.

9 Q. So you didn't have a perception at a  
10 certain point in time he was driving to get more  
11 investor money --

12 A. No.

13 Q. -- it wasn't something you appreciated?

14 A. No. It was just ongoing.

15 Q. Did you use any software or anything  
16 like that to manage the construction or to  
17 oversee the constructive activity?

18 A. It wasn't my wheelhouse.

19 Q. Who was keeping track of the  
20 construction expenditures and how much was being  
21 spent?

22 A. That was Tony and Richard Stabile.

23 Q. Tony?

24 A. Tony, I'll tell you last name, Tony  
25 Ulisse, U-l-i-s-s-e, and Richard Stabile.

1 Stabile was a realtor that was working with NRIA  
2 at the time.

3 Q. Do you know who the principals of U.S.  
4 Construction are?

5 A. I found out John Ferino and Nick's son  
6 Dustin.

7 Q. You didn't have anything to do with that  
8 entity?

9 A. No.

10 Q. You never worked for it?

11 A. No.

12 Q. Never consulted for it?

13 A. No.

14 Q. Never consulted for any of the owners?

15 A. No.

16 Q. So was U.S. Construction, were they  
17 basically the prime contractor with a bunch of  
18 subs under them, is that how U.S. Construction  
19 got in the chain?

20 A. Yes.

21 Q. Was U.S. Construction marking up the  
22 bills from vendors?

23 A. I don't know.

24 Q. Could they have been?

25 A. That wasn't my wheelhouse. I don't

1 know.

2 Q. The gentleman that you said spoke to you  
3 and said the people were complaining, did he work  
4 for NRIA?

5 A. Yes.

6 Q. He didn't work for U.S. Construction?

7 A. No.

8 Q. So was it U.S. Construction's bills that  
9 weren't getting paid?

10 A. I believe U.S. Construction was  
11 complaining and maybe one or two of the other  
12 vendors off the top of my head.

13 Q. Do you know who hired U.S. Construction?

14 A. They were in the company when I got  
15 there.

16 Q. When you say in the company?

17 A. They already had a relationship with  
18 NRIA when I got there.

19 Q. When you initially got there?

20 A. Yes.

21 Q. Before you were an employee when you  
22 were a 1099 --

23 A. No. When I was an employee.

24 Q. So when you first became the 1099  
25 employee they were involved but you're not sure

1 about before that time?

2 A. No.

3 Q. When you came in in that time period in  
4 2019 were there construction projects going on?

5 A. Yes.

6 Q. Were you involved with training any of  
7 the closers?

8 A. No.

9 Q. Do you know who was?

10 A. Art and A.J. Art Scutaro and A.J.  
11 Scutaro.

12 Q. Who created the scripts for them to  
13 pitch the investors?

14 A. Nick.

15 Q. Did you ever see these scripts?

16 A. Yeah, I read them.

17 Q. You did?

18 A. Yes.

19 Q. Did you make any revisions to them?

20 A. No.

21 Q. Did Nick ever advise you to have the  
22 advertisements or any of the documentation back  
23 off on the assertion of a 12 percent return?

24 A. No.

25 Q. And you never went to Nick or Rey and

1 said we can't say 12 percent returns anymore?

2 A. It wasn't them -- it wasn't me saying  
3 it. I believe Brian Casey is the one that told  
4 that to Rey.

5 Q. What was his role at the company?

6 A. He came in as co-fund manager originally  
7 on the advice of the attorney, Sills and Cummis I  
8 believe.

9 Q. Co-fund manager?

10 A. Yes.

11 Q. He had to come in, did he work with Nick  
12 then?

13 A. No. Nick was no longer there. Nick was  
14 working from his home. Brian Casey came in to  
15 help strengthen the company in running the  
16 company and managing it.

17 Q. So even though Nick wasn't there at the  
18 location he was still controlling the company  
19 from his home?

20 A. Correct.

21 Q. And the fund manager was basically  
22 taking Nick's place in the company?

23 A. Correct.

24 Q. What was that individual's name again?

25 A. Brian Casey.



1 Q. Do you know what his background is?

2 A. Independent consultant. He's worked  
3 with a few attorneys. That's why he came over  
4 here. He was referred by one of the attorneys.

5 Q. So he's like a financial guy that was  
6 referred by the attorneys?

7 A. Yeah.

8 Q. At Sills Cummis?

9 A. Don't mark me on which attorney referred  
10 him.

11 Q. That's okay. What another firm do you  
12 remember other than the Sills Cummis?

13 A. We had Sills Cummis. We had Nick's  
14 private attorney, the gentleman from Washington.  
15 I don't remember his name off the top of my head.  
16 Rey's attorney.

17 Q. They were all rendering services to  
18 NRIA?

19 A. To them personally, yes.

20 Q. But how about to NRIA did they have any  
21 other lawyers other than --

22 A. We had Glenn Glerum was a real estate  
23 attorney that was doing closings. I had the  
24 attorney down in Florida, Tom -- bear with me a  
25 minute. He was doing closings for us to Florida.

1 Q. I'm more or less interested in people  
2 that were advising the company about the issues  
3 that were going on --

4 A. No.

5 Q. -- as opposed to real estate closings.

6 A. No.

7 Q. Sills Cummis is the only one you  
8 recollect?

9 A. Yes. They were also doing HR work for  
10 us.

11 Q. Do you recall when Sills Cummis was  
12 hired, what year?

13 A. They were already hired by Rey. I don't  
14 remember when. They were here for a while.

15 Q. Do you remember the names of any of the  
16 lawyers from Sills Cummis?

17 A. Patti, Patricia Prezioso,  
18 P-r-e-z-i-o-s-o. She was my main contact.

19 Q. So you were the one communicating with  
20 her?

21 A. Yes. Mainly on HR issues.

22 Q. I want to focus on the other issues they  
23 were there for. Were you speaking to her about  
24 those as well?

25 A. In general, yeah.

1 Q. Do you have a criminal record?

2 A. No.

3 Q. Have you ever been arrested?

4 A. Nope.

5 Q. Who is Art Scutaro?

6 A. He was the senior VP of sales or project  
7 manager we'll call it.

8 Q. Which one is it?

9 A. You officially can't sell securities so  
10 he was a project manager.

11 Q. Do you know whether Mr. Scutaro has a  
12 criminal record?

13 A. No. Not as far as I know.

14 Q. You're saying you don't know or he  
15 doesn't?

16 A. As far as I know, no.

17 Q. Do you know why he spells his name  
18 sometimes with one T and sometimes with two?

19 A. Yes.

20 Q. Why?

21 A. Because he was connected with Nick  
22 Salzano at another company called Norvirgins.  
23 Norvirgins went bankrupt and I believe he in a  
24 Google search felt it was easier to take one of  
25 the Ts out of his name.

1 Q. Was that your advice?

2 A. No.

3 Q. Did you ever talk to him about that?

4 A. No. I didn't even know about it until  
5 at the very end.

6 Q. Was he there on a day-to-day basis, Art  
7 Scutaro?

8 A. Pretty much, yeah.

9 Q. So when you say he was a project manager  
10 because he couldn't sell securities or because  
11 you couldn't call it securities?

12 A. You can't call it sales -- you can't get  
13 a commission on a sale of securities unless  
14 you're a registered broker. We didn't have a  
15 registered broker so they called them project  
16 managers and they were paid accordingly under the  
17 project manager contract.

18 Q. How were project managers -- so what  
19 you're really saying is project managers were  
20 closing investor deals, right?

21 A. Correct.

22 Q. Instead of getting a commission for the  
23 sale of the security you paid them as a project  
24 manager, a commission as a project manager?

25 A. Correct.

1 Q. How much did those commissions --

2 A. It varied depending on the amount of  
3 calls they made, depending on the amount of  
4 paperwork they generated it varied. It was a  
5 hundred plus to one of them or two of them were  
6 making 800 to 900,000.

7 Q. 800 to 900,000 a year?

8 A. Yeah.

9 MR. GEORGE: Sounds like we're in the  
10 wrong line of business, Aneca.

11 THE WITNESS: I thought about that.

12 MS. LASLEY: But we're not facing jail  
13 time.

14 (Off the record)

15 Q. Did you ever see any contract with  
16 Javier to require them to bill at the lowest  
17 possible price for advertising?

18 A. No.

19 Q. I just want to ask you a couple more  
20 questions about the EB-5 program. Can you tell  
21 me generally how that program works?

22 A. Basically you have a project and if it's  
23 in a T-zone area your investment amount is lower  
24 than the standard EB-5 investment amount. So...

25 Q. Let me stop you for a second. The EB-5

1 is a federal program --

2 A. Correct.

3 Q. -- that allows people who are aliens to  
4 get a Green Card by investing --

5 A. In projects in the states, yes. The  
6 investment has to create 10 jobs for a minimum of  
7 two years. And basically once the project is  
8 done, whether it be sold, refinanced or whatever,  
9 the money comes back to the investors with any  
10 type of return which is a minimum return anywhere  
11 between 3 to 6 percent on an average.

12 Q. So, Mr. La Mattina, how did the  
13 individual investor create if he's building a  
14 residential unit and he's investing in a  
15 residential unit, how does he create 10 jobs that  
16 lasts for two years?

17 A. It wouldn't be -- it would be a project.  
18 It would be like an apartment building. It would  
19 be like a mall, something like that.

20 Q. Where the construction lasts --

21 A. Lasts for a while for a minimum of two  
22 years but also your jobs were to be accountants,  
23 attorneys, financial planners, all looking at the  
24 numbers. You would have architects. You would  
25 have appraisers. You'd have workers building

1 with steel, concrete, whatever. Then you would  
2 have people that would manage the projects, let's  
3 say maintenance people that are filling  
4 apartments up with people to sell or rent  
5 contracts and stuff like that.

6 Q. Like if an investor got a unit and he  
7 was still holding it for investment there were  
8 people that would rent the units for them, is  
9 that what you're saying?

10 A. No, somebody that would manage a  
11 building for them, like a building manager,  
12 cleaning the building, stuff like that.

13 Q. Did you have buildings where one or two  
14 investors owned all the units?

15 A. No.

16 Q. Basically --

17 A. This is just a project where you have --  
18 like one project, we had 97 units with a retail  
19 spot on the -- that's an EB-5 project in North  
20 Bergen.

21 Q. Who monitors the length of time and the  
22 employees or is it just the certifications?

23 A. There's an independent company set up by  
24 the U.S. Government called USCIS. What they do  
25 are the policemen of the EB-5. We contract an

1 attorney, Mona Shah, she was an EB-5 attorney.  
2 She handled all the investors that wanted to  
3 invest money for us. She would qualify them to  
4 make sure the money is real, not any issues. She  
5 would then fill out the paperwork and submit  
6 everything to the USCIS. And then once that  
7 happens the money would go from her escrow  
8 account to the USCIS project. And from there it  
9 would be disbursed from the project to NRIA.

10 Q. So the investor money first went through  
11 USCIS?

12 A. It would go to Mona Shah first.

13 Q. The attorney through her escrow account?

14 A. And then it would go to the regional  
15 center. The regional center is the actual feet  
16 on the ground for the USCIS. So it would go to  
17 the regional center and then to NRIA.

18 Q. And you're saying that USCIS was the one  
19 who cut the check to NRIA?

20 A. No, it would go from the regional  
21 center. And the regional center is basically  
22 feet on the ground.

23 MS. LASLEY: Counsel, could we take a  
24 break?

25 THE VIDEOGRAPHER: We're going off the



1 record. The time is 1:58 p.m.

2 (Afternoon recess)

3 THE VIDEOGRAPHER: We are back on the  
4 record. The time is 2:12 p.m.

5 BY MR. GEORGE:

6 Q. I just have a few more things to go  
7 through, Mr. La Mattina, and thank you for being  
8 patient with us today. I know these things are  
9 stressful.

10 There was a statement that was made that the  
11 company spent over \$80 million on advertising and  
12 media buys. Are you aware of any of that?

13 A. I never heard the exact number like  
14 that, no.

15 Q. Do you know who the other vendors were  
16 that were supplying media time to the company  
17 other than Javier and Media Effective?

18 A. You had H&L.

19 Q. They were selling directly too?

20 A. I believe so. And then you had someone  
21 like Star Ledger, New Jersey Media maybe. It's  
22 been a while.

23 Q. New Jersey Media, is that what it's  
24 called?

25 A. I believe so, yeah.

1 Q. Is that part of the Star Ledger?

2 A. That's part of the Star Ledger. That's  
3 their media side.

4 Q. Star Ledger is the North Jersey paper,  
5 right?

6 A. Yeah.

7 Q. When was the last time you spoke to  
8 either Rey or Nick?

9 A. Let's see. Last time I spoke to Rey was  
10 probably a Zoom call when he was in the  
11 Philippines probably about nine months ago, a  
12 year ago. And Nick I haven't spoken to him since  
13 the -- since I left the company.

14 Q. You said that Rey is in the Philippines?

15 A. Yeah.

16 Q. Still?

17 A. Yeah.

18 MR. GEORGE: I think that's all I have.

19 EXAMINATION BY MS. LASLEY:

20 Q. Mr. La Mattina, we met this morning.

21 Aneca Lasley with Ice Miller. I do have a few  
22 follow-up questions for you. Earlier on this  
23 morning when Mr. George first started questioning  
24 you you had talked about having met with the  
25 Liquidation Trustee.

1 I want to be clear about something. In terms  
2 of your meeting did you meet with the Liquidation  
3 Trustee or counsel for the Liquidation Trustee?

4 A. Counsel.

5 Q. So it's fair to say you've never met  
6 with Matthew Ward, the Liquidation Trustee?

7 A. Yes.

8 Q. That is fair to say you've never met?

9 A. Yes.

10 Q. In terms of timing that's the other  
11 thing I wanted to clarify here. I know you don't  
12 remember the specific time of when you first met  
13 with the Liquidation's counsel but --

14 A. The attorney you mean?

15 Q. The attorney for the Liquidation  
16 Trustee. See I did it too. But regardless you  
17 met one time in person with counsel for the  
18 Liquidation Trustee; is that correct?

19 A. Correct.

20 Q. If I told you that that meeting was in  
21 January of 2024, does that seem about right to  
22 you?

23 A. Yeah.

24 Q. So if earlier there was some reference  
25 to it being in 2021 or 2022 that would not be

1 correct?

2 A. You're right.

3 Q. And when you met with counsel for the  
4 Liquidation Trustee, Mr. Rick Barry, a consultant  
5 to the Liquidation Trustee was present as well?

6 A. Correct.

7 MR. GEORGE: Did you say consultant?

8 MS. LASLEY: Correct.

9 MR. GEORGE: Is he a hired consultant?

10 MS. LASLEY: Yes.

11 BY MS. LASLEY:

12 Q. When you met with counsel for the  
13 Liquidation Trustee did counsel for the  
14 Liquidation Trustee ask you to be truthful?

15 A. Yes.

16 Q. And at any point in time did counsel for  
17 the Liquidation Trustee ever ask you to  
18 manufacture or falsify any information with  
19 regard to either Media Effective or Javier  
20 Torres?

21 A. No.

22 Q. I'll stop there. Did the counsel for  
23 the Liquidation Trustee ask you to falsify  
24 information with regard to anything related to  
25 NRIA?

1 A. No. No.

2 Q. You've got your declaration in front of  
3 you. That was La Mattina Exhibit 6. You recall  
4 receiving a copy of that declaration that had  
5 been drafted for you to review, correct?

6 A. Correct.

7 Q. And you were given an opportunity to  
8 review all of the statements in that declaration,  
9 correct?

10 A. Correct.

11 Q. And I believe you said that you had some  
12 changes to it, correct?

13 A. Correct.

14 Q. So you had an opportunity to make  
15 revisions to it --

16 A. Correct.

17 Q. -- if you wanted to?

18 A. Correct.

19 Q. And prior to signing it did you have the  
20 opportunity to read through everything?

21 A. To be honest with you, no, I did not  
22 read it fully.

23 Q. I know you apparently didn't read it  
24 fully based on what we talked about here today,  
25 but you had an opportunity to read it, correct?

1 A. Correct.

2 Q. And with regard to the interview that  
3 you had with counsel for the Liquidation Trustee  
4 do you recall talking with the Liquidation  
5 Trustee about concerns you had regarding the  
6 rates that were being charged by Media Effective?

7 A. The conversation was -- again, I don't  
8 know the exact question they put out there but it  
9 was basically -- what I did I reviewed bids that  
10 Nick requested. When the bids came in I looked  
11 at them and then sent them over to Nick and gave  
12 him my recommendation of what I saw, about the  
13 cost of whoever was bidding and when I looked at  
14 I believe one of the bids Javier was higher and I  
15 said to Nick and Nick said Javier is my boy or my  
16 man whatever he called it. Don't worry about it.  
17 I said okay.

18 Q. Did Nick Salzano ever tell you he  
19 trusted Javier?

20 A. Yes. Maybe not directly but his mood  
21 and what he said showed trust I guess.

22 Q. Did you ever have any discussion with  
23 Nick Salzano about his relationship with Javier  
24 Torres?

25 A. No.

1 Q. I know you mentioned when you came on to  
2 NRIA as an employee that Javier was already doing  
3 business with NRIA?

4 A. Correct.

5 Q. Did you ever have any discussions about  
6 how that relationship began?

7 A. No.

8 Q. Take a look at La Mattina Exhibit 10.  
9 This is that Top 100 Magazine article.

10 A. Okay.

11 Q. Do you recall how -- you said you were  
12 interviewed for this article?

13 A. Generally.

14 Q. Describe the process for me what you can  
15 remember?

16 A. A repoeter called and says hey, we're  
17 doing an interview. We're going to give you the  
18 opportunity to be in the Top 100 Magazine.  
19 Basically give us a little overview of what  
20 you've done, what you do, who you are. I sent it  
21 over to them and one of the reporters called me  
22 up and said okay, let's talk about this. I said  
23 okay. This sounds good and that was it.

24 Q. In terms of the questions that are  
25 reflected in this article were these the

1 questions they asked you when they called you  
2 then?

3 A. Correct.

4 Q. And was anyone -- so you sent over  
5 information about yourself and about the company  
6 generally ahead of time?

7 A. Correct.

8 Q. And then you had an actual interview  
9 over the phone?

10 A. Correct.

11 Q. And was there anybody else sitting with  
12 you for that interview?

13 A. I don't remember, no.

14 Q. You don't remember?

15 A. No.

16 Q. But in terms of everything that's in  
17 bold are these questions that you remember them  
18 asking you as part of the interview?

19 A. I believe the questions were answered  
20 but when the article came out they were more  
21 embellished.

22 Q. Did you have an opportunity to review it  
23 before the article was published?

24 A. Yeah.

25 Q. Did you recall making any changes to the



1 article before it was published?

2 A. Not off the top of my head. I believe I  
3 let Rey and Nick also look at it prior to going  
4 published.

5 Q. I'm done with that exhibit. Exhibit 1  
6 is your subpoena for the testimony. And earlier  
7 this morning Mr. George went through with you the  
8 documents that -- some of the documents you were  
9 requested to bring with you to the deposition,  
10 correct?

11 A. Correct.

12 Q. And did counsel for the Liquidation  
13 Trustee ever tell you anything about -- to not  
14 produce any documents?

15 A. No. No.

16 Q. Did counsel for the Trustee ask you  
17 whether you had documents?

18 A. They asked me if I had anything. I said  
19 no.

20 Q. When Mr. George was asking you about a  
21 statement in your declaration regarding paragraph  
22 7 that references the criminal trial of Nick  
23 Salzano you said you didn't realize it began on  
24 March 5th of 2024. Are you aware that Nick  
25 Salzano has since plead guilty?

1 A. Yes.

2 Q. And how did you become aware of that?

3 A. John Collins gave me a call. He  
4 mentioned it.

5 Q. When did Mr. Collins call you?

6 A. Maybe two weeks ago.

7 Q. Was it on the day that he entered his  
8 guilty plea?

9 A. I don't know.

10 Q. Just for the record who is John Collins?

11 A. John Collins was an associate that I  
12 worked at at NRIA. He handled investor relations  
13 for us, helping the investors go over the  
14 paperwork.

15 Q. What did he say to you when he called  
16 you?

17 A. He said I heard Nick took a plea. I  
18 said oh, really. Okay.

19 Q. Did you read anything about the plea  
20 that was entered?

21 A. No, I didn't go through the dockets.

22 Q. Have you heard anything about the  
23 allocation testimony that Nick Salzano provided?

24 A. No.

25 Q. Are you aware he has admitted to

1 conducting -- operating a Ponzi scheme?

2 A. Obviously he's being sentenced, yes.

3 Q. Remind me again when you left the employ  
4 of NRIA?

5 A. August 26, 2022.

6 Q. Since August 26th of 2022 have you  
7 spoken -- who all from NRIA have you spoken with  
8 since then?

9 A. Quite a few different people. A couple  
10 of the salespeople, Art, A.J., John Collins,  
11 Tanvi, my nephew Zach Luca, his father Joe Luca,  
12 Byron Cortese, one of the salespeople. My mother  
13 passed away recently so a few of them reached out  
14 to me also.

15 MR. GEORGE: Sorry about that.

16 THE WITNESS: 101.

17 (Off the record)

18 BY MS. LASLEY:

19 Q. When is the last time you had spoken  
20 with Tanvi Chandra?

21 A. Maybe a month ago.

22 Q. What was the purpose of that call?

23 A. Just wondering what was going on. Just  
24 catching up basically.

25 Q. Did she have any conversation with you

1 about this case?

2 A. No.

3 Q. In terms of the documents that you've  
4 seen regarding the cease and desist and what it  
5 was that Tanvi was allegedly doing representing  
6 herself as affiliated with NRIA, what was your  
7 knowledge of what Ms. Tanvi -- what Ms. Chandra  
8 was doing at the time so back when you were with  
9 NRIA versus today?

10 A. When I was with NRIA her position was  
11 bringing in advertisements for the South Asian  
12 community. And today I have no idea what she's  
13 doing other than ShopRite. She works doing  
14 advertisement for ShopRite in the Edison area.

15 Q. While you were with NRIA did you believe  
16 that Ms. Chandra was misrepresenting her  
17 affiliation with NRIA to advertisers?

18 A. Not that I was aware of. I know she had  
19 an agency letter she was requested to get and she  
20 was given the agency letter and that was it.

21 Q. I've got a question about that because  
22 just for the record explain what an agency letter  
23 is?

24 A. She's been given authorization by the  
25 company to negotiate on the company's behalf for

1 advertising.

2 Q. How does an advertiser get an agency  
3 letter?

4 A. Requested by the company.

5 Q. Who from the company was responsible for  
6 issuing agency letters?

7 A. Nick asked me to produce one and I gave  
8 it to Tanvi.

9 Q. When did Nick Salzano -- do you recall  
10 when he asked you to produce one?

11 A. I don't know the date.

12 Q. Did you ever produce an agency letter to  
13 Ms. Chandra without being told to do so by Nick  
14 Salzano?

15 A. No.

16 Q. Is there a process by which you revoke  
17 an agency letter?

18 A. Not that I'm aware of other than  
19 canceling the old agency letter and getting a new  
20 one with somebody else.

21 Q. We saw some exhibits to the effect that  
22 it went through that process with Tanvi and  
23 replaced her with Mr. Torres effective  
24 immediately?

25 A. Yes.

1 Q. Do you recall that?

2 A. Yes.

3 Q. Prior to that process we saw reflected  
4 in that exhibit had that ever been done before  
5 that point in time?

6 A. No.

7 Q. So until you go through that process  
8 Ms. Chandra has the authority due to the agency  
9 letter to act on behalf of the company?

10 A. Correct.

11 Q. You were asked about your CV which I  
12 think is La Mattina Exhibit 7. I believe you had  
13 said or it was represented perhaps that the CV  
14 reflected in Exhibit 7 that you have since made  
15 changes to your CV and removed references to  
16 NRIA?

17 A. You mean my LinkedIn, yes.

18 Q. Your LinkedIn is Exhibit 9?

19 A. Yeah, I took out NRIA.

20 Q. Since leaving the employ of NRIA have  
21 you had difficulty finding employment?

22 A. Yes.

23 Q. Does that in any way impact the decision  
24 you made to make -- delete references to NRIA on  
25 your LinkedIn?

1 A. Yes.

2 Q. Explain that.

3 A. Well, because I worked for a company  
4 that was called a Ponzi scheme I probably put out  
5 200 to 300 resumes, got calls, got interviewed,  
6 not even an offer. I did get an offer from one  
7 company to be an independent -- to work as a  
8 consultant and traveling around the country  
9 evaluating different businesses. There was a  
10 third interview. Was hired. I was given their  
11 paperwork. I did a background check  
12 authorization and it came back, like I said, that  
13 I worked for NRIA and I was part of a Ponzi  
14 scheme.

15 So on Wednesday I filled out the paperwork.  
16 I was hired. On Friday they called me up and  
17 said oh, by the way, we decided not to hire you  
18 based upon your prior history being a COO of a  
19 company that was part of a Ponzi scheme. I said  
20 it had nothing to do with me and they didn't want  
21 to hear it.

22 MS. LASLEY: Mr. La Mattina, those are  
23 all questions I have for you.

24 MS. BAXTER: No questions.

25 BY MR. GEORGE:

1 Q. So just a couple more, Mr. La Mattina.  
2 I just learned from Ms. Lasley that Mr. Barry is  
3 a consultant that was hired by the Trustee. Were  
4 you aware of that when you first made contact  
5 with him?

6 A. I believe he was hired by the fund I  
7 call it, the Trustee.

8 Q. But were you aware of that when he first  
9 contacted you?

10 A. Yes.

11 Q. He said I've been hired by the Trustee?

12 A. Yes.

13 Q. What did he tell you his intentions were  
14 with respect to --

15 A. He just wanted to talk and see what I  
16 did and what was going on. He had some pertinent  
17 questions. That was it.

18 Q. Did he give you -- do you know where  
19 he's located?

20 A. No.

21 Q. Does he still work for the New Jersey  
22 SEC or he's just a consultant?

23 A. I have no idea.

24 Q. How often do you talk to Mr. Barry?

25 A. Prior to coming here, probably maybe



1 about three times over the last month and prior  
2 to that I don't know, a couple months, maybe a  
3 year since he last contacted me.

4 Q. Has he acted as an intermediary for  
5 communications between you and the Trustee?

6 A. Yes.

7 Q. He calls you and says the Trustee wants  
8 to know this. You give the information to him  
9 and he gives it back to the Trustee?

10 A. Or he asks me a question and I give him  
11 an answer. That's it.

12 MR. GEORGE: That's it. That's all I  
13 have.

14 THE VIDEOGRAPHER: We are going off  
15 record. The time is 2:33 p.m. This concludes  
16 the video deposition.

17 THE REPORTER: Counsel, do you want a  
18 copy of the transcript?

19 MS. BAXTER: Yes.

20 MS. LASKEY: Expedited, please.

21

22 (Deposition concluded)

23

24

25

CERTIFICATION

I, Alan L. Lesky, a Certified Shorthand Reporter of New Jersey, license number XI000730, approved reporter of the United States District Court and notary public, Commissioner of the Pennsylvania Court of Common Pleas hereby certify that the foregoing is a true and accurate transcript.

I further certify that I am neither attorney nor counsel for, not related to nor employed by any of the parties to the action in which this transcript was taken; and further, that I am not a relative or employee of any attorney or counsel employed in this action, nor am I financially interested in this case.

The foregoing transcript is prepared with the current Transcript Format for Judicial Proceedings.

*Alan L. Lesky*  
(S) Alan L. Lesky,  
Certified Court Reporter

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